

Report



# Troubled Waters

The Human Rights Cost of Military-led Enterprises in Egypt's Fishing Sector

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A Report By



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## Glossary:

- Egyptian Armed Forces (EAF)
- Ministry of Defense (MoD)
- Ministry of Military Production (MoMP)
- Egyptian Ministry of Emigration (MOE)
- National Company for Fisheries and Aquaculture (NCFA)
- National Service Projects Organization (NSPO)
- National Authority for Military Production (NAMP)
- Armed Forces Engineering Authority (AFEA).
- General Authority for Fish Resources Development (GAFRD)
- Lakes and Fish Resources Protection and Development Agency (LFPRDA)
- Gulf Cooperation Council (GCC)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

## Executive Summary:

This report presents the findings of research on the **socio-economic impacts** of the creation of military-controlled fishing and aquaculture complexes in **four Egyptian lakes** (Burullus, Mariout, Ghalioun, Manzala).

Combining policy analysis, the mapping of human rights violations, and interviews with local residents, our work demonstrates the **nexus between military dominance in the fishing and aquaculture industry** and the **worsening of poverty** and **unemployment** among the local population. The report also documents other human rights violations against local communities linked to the establishment of the military-controlled complexes, including arbitrary arrests and detention of fishers and their trials in military courts, and the displacement of small-scale civilian businesses.

The military-run interventions on Lake Ghalioun, Lake Burullus, Lake Manzala, and Lake Mariout were purportedly intended to relaunch local fish production, decrease poverty and unemployment, and offer an alternative to migration to impoverished locals. Following the acquisition of lake waters and pre-existing aquaculture complexes by the EAF, however, local communities were deprived of access to traditional fishing sites and started facing increasing, largely arbitrary, bureaucratic constraints to the renewal of fishing licenses. No compensation was offered for the loss of income, and those who tried to maintain fishing licenses became entrapped in spirals of debt, often leading to imprisonment under Egyptian Penal Law.

Moreover, a campaign of arbitrary arrests against local fishers, many of whom subsequently languished in detention for years while awaiting trial based on ungrounded charges spanning from “fishing without a license” to “affiliation with a terrorist group”, led to over 140 arbitrary arrests between March 2020 and July 2024, while arrests continue to the present day. In most cases, no evidence was presented by the authorities in support of the charges, and the defendants were detained in **inhumane conditions** within overcrowded prison facilities.

While local communities relying on fishing for their livelihoods are the most affected group, military dominance in the economy also produces macro-level distortive effects, aggravating the volatility of the Egyptian economy and driving unsustainable borrowing practices. Moreover, the **lack of public scrutiny, accountability, and participatory consultation** with the residents has paved the way for multiple interlocked adverse outcomes. **Such outcomes do not represent isolated incidents, but rather exemplify the predatory and unsustainable nature of the EAF’s presence in the Egyptian economy.**

## Methodology:

This research employed triangulation of different data gathering techniques, including OSINT, and structured interviews with fishers and their families to explore the adverse consequences of mega projects on their daily lives and livelihoods.

OSINT (Open-Source Intelligence) sources included publicly available data on mega projects, such as government reports, news and articles, publicly available photographs and information, and research conducted by credible civil society organizations or academic experts. In the case of Lake Mariout, a complaint submitted by the Mariout Fishers Syndicate to the Egyptian Cabinet of Ministers was also examined as a source for this report.

EgyptWide researchers conducted a total of 36 interviews, including interviews with 29 family members, 2 previously detained fishers, and 5 lawyers, distributed as follows:

- Lake Ghalioun (Burj Mughazal): 18 family members representing 18 detained fishers, and one lawyer representing a local fisher;
- Lake Burullus: 5 local fishers and other residents;
- Lake Manzala: 6 family members of detained fishers, as well as 2 fishers who completed their sentence, and 2 lawyers representing local fishers;
- Lake Mariout: 2 lawyers representing local fishers.

All interviews were conducted remotely in Arabic between November 2024 and March 2025.

The interviews addressed the impact of mega projects on local fishers and their families' livelihoods and socio-economic conditions, including the working conditions of fishing and their ability to meet their families' basic needs, before delving into how military-led development projects of the lakes have impacted their daily and professional lives.

Secondly, interviews investigated the arrest of fishers, the conditions of their detention, and the charges filed against them. The arrests are further analyzed to explore their impact on the economic and social rights of fishers and their families (i.e., how spouses and children were able to provide for their basic needs, such as food, healthcare, and education, and to cover the costs of visiting their relatives in prison).

Interviews with lawyers focused on the legal aspects of cases, including the charges filed against fishers, the conditions of their trials and detention, and the laws under which they were tried.

18 interviews were conducted with wives, mothers, and sisters of imprisoned fishers, representing approximately 47% of the total interviews in this report. In most cases, the interviews were conducted in conditions of anonymity due to the prevailing security and political concerns, with participants granting their consent to the use and publication of interview excerpts and content in this report. A strict code of anonymity (with the use of pseudonyms) is adopted throughout the report to protect interviewees' privacy and safety.

## 1. Background:

With the rise of the military to power in 2014, the Egyptian economic landscape has witnessed a progressive concentration of national wealth in the hands of the EAF through the militarization of economic governance and the seizure of assets through Presidential decrees. In this report, we shall refer to this process as *militarization of the Egyptian economy* to capture the multifaceted dimensions of the military establishment's influence over Egypt's economic sphere, a pattern which is profoundly distorting the relationship between citizens and the state<sup>1</sup>. This economic regime, whose progressive institutionalization under Sisi built on pre-existing legislation, has earned the military establishment quasi-monopolistic financial privileges which enabled it to dominate strategic sectors and public assets, including civilian enterprises, infrastructure, and natural resources<sup>2</sup>.

While the EAF's faculty to intervene in the national economy was introduced by Nasser-era (1956-1970) legislation, subsequent policy reforms consolidated the military's grip over productive activities and resource management, sidelining democratic civilian oversight.<sup>3</sup> Military dominance in the national economy has further been entrenched through the involvement of agencies and entities under the Ministry of Defense (MoD) and its subordinated Ministry of Military Production (MoMP). Military-controlled economic enterprises are characterized by general opacity, with no publicly-available financial records or feasibility studies, while funding and spending are kept off-budget.<sup>4</sup>

Since 2014, this state of opacity has only worsened, reaching an unprecedented concentration of national wealth in the hands of the MoD through the militarization of key economic sectors and the seizure of assets through Presidential decrees. The EAF's presence in the civilian economy spans several sectors, including cement and steel industries, housing and urban infrastructure projects, electric appliances, alimentary products, and farming and agriculture.

The entrenchment of military control over democratic institutions, and the consolidation of its gatekeeping role in economic policy and governance processes, further accelerated the militarization of the Egyptian economy, arriving to shape markets and influence the allocation of state budgets and borrowing practices.<sup>5</sup> State institutions and civilian agencies are

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<sup>1</sup> Sayigh, Yazid, "Retain, Restructure, or Divest? Policy Options for Egypt's Military Economy", Carnegie Endowment for International Peace, 31 January 2022, <https://egyptwide.short.gy/tBqUGB> (last accessed December 21, 2025).

<sup>2</sup> Barayz, Abdel Fattah, "The Military and Economy in Egypt," Jadaliyya website, 25 January 2016, <https://egyptwide.short.gy/0miCa8> (last accessed December 21, 2025).

Sayigh, Yezid. *Owners of the Republic: An Anatomy of Egypt's Military Economy*. Carnegie Endowment for International Peace, 2018.

<https://egyptwide.short.gy/r1mnUR>

Sayigh, Yezid, "Egypt's Military Now Controls Much of Its Economy. Is This Wise?," Carnegie Endowment for International Peace, <https://egyptwide.short.gy/dR0wsD>. (last accessed December 21, 2025).

<sup>3</sup> Barayz, Abdel Fattah, "The Military and Economy in Egypt," Ibid.

<sup>4</sup> Sayigh, Yezid. *Owners of the Republic: An Anatomy of Egypt's Military Economy*. Ibid.

Abul-Magd, Zeinab. *Militarizing the Nation: The Army, Business, and Revolution in Egypt*. Columbia University Press, 2017.

<sup>5</sup> Ibid. also see: "Egypt: Constitutional Amendments Entrench Repression", Human Rights Watch news, 20 April 2019, <https://egyptwide.short.gy/AxnQDI> (last accessed December 21, 2025).

increasingly sidelined by the mushrooming of parallel military entities that are *de facto* in charge of economic governance.<sup>6</sup>

Therefore, the militarization of the Egyptian economy is not an isolated set of incidents, but rather a process of accumulation backed by a comprehensive legal architecture and surrounded by secrecy justified by military or national security law. Transparency and accountability in EAF-led interventions in the national economy are hindered by the near-complete absence of civilian oversight and the weakening of independent anti-corruption bodies and the democratic state institutions, most notably the Parliament and the Central Auditing Organization.<sup>7</sup>

This report sheds light on the Egyptian Armed Forces' control over lake development and aquaculture projects in four Egyptian lakes: Ghalioun, Burullus, Manzala, and Mariout. The report opens with a section exploring the emergence and role of mega projects in the Egyptian economy and the entrenchment of military dominance in economic governance. The following chapter illustrates the findings of our research on the deterioration of socioeconomic rights among fishers' communities and other human rights violations connected to the establishment of mega projects.

The next section explores the nexus between the worsening of living conditions among coastal communities in Egypt and trends in irregular departures towards Europe, reflecting on the ineffectiveness of prevention strategies based on deterrence. Finally, the report contains a review of the key policy framework, which consolidated military dominance over the Egyptian economy, paving the way for the violations documented in the previous sections.

The report is complemented by recommendations to uphold accountability, sustainable and transparent economic governance, and fundamental human rights, incorporating the demands voiced by local communities affected by the mega projects.

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"Egypt: New Laws Entrench Military Power Over Civilians," Human Rights Watch news release, March 4, 2024, <https://egyptwide.short.gy/1dc36L> (last accessed December 21, 2025).

<sup>6</sup> Samy, Yomna, "The Growth of the Military Economy in Egypt Since 2014: The Impact on Investment Dynamics and Investor Rights", Rowaq Arabi, 19 August 2025, <https://egyptwide.short.gy/q1MuPT> (last accessed December 21, 2025).

<sup>7</sup> Noll, Jessica, "Fighting Corruption or Protecting the Regime? Egypt's Administrative Control Authority", Project on Middle East Democracy (POMED), 6 Feb 2019, <https://egyptwide.short.gy/pzBx1O>. (last accessed December 21, 2025).

Kuimova, Alexandra, "Understanding Egyptian Military Expenditure", Stockholm International Peace Research Institute (SIPRI), Oct 2020, <https://egyptwide.short.gy/HFYayw>. (last accessed December 21, 2025).

## 2. Mega Projects: Whose Better Economy?

“Mega projects” are large-scale infrastructure, urban development, and economic initiatives launched by the government to stimulate economic growth, create jobs, modernize infrastructure, and enhance Egypt's regional and global competitiveness. They involve significant investments, advanced engineering, and partnerships with private and international entities- all of which, in governmental narratives, should create jobs, attract investments, and ultimately generate income.<sup>8</sup>

The reports and protocols signed by the former Egyptian Ministry of Emigration (MOE) – part of the Ministry of Foreign Affairs since July 2024 – and the National Coordinating Committee for Combating Illegal Migration and Trafficking in Persons (NCCPIM&TIP) demonstrate the government's awareness of the worsening socio-economic conditions in specific areas across Egypt.<sup>9</sup> The NCCPIM&TIP, established in 2016 and formed in 2017, is a nationwide strategy to combat irregular migration by spreading awareness of the dangers faced by migrants. The initiative targeted six Egyptian governorates considered to have the highest number of irregular departures, namely Kafr El-Sheikh, Beheira, Fayoum, Gharbia, Dakahlia, and Assyut.

When the government launched a series of plans for revitalizing the Egyptian economy in 2014<sup>10</sup>, these six governorates have become the object of significant state intervention to transform their social and economic landscapes. The selection criteria that led to their identification are a high rate of poverty or vulnerability to poverty, ranging from ≈50% in Gharbia and Dakahlia to +80% in Assyut, and the amount of irregular departures towards Europe, according to the most recent NCCPIM&TIP figures (2017-18)<sup>11</sup>.

Out of 7545 projects initiated nationwide in 2014, 2380 have been either completed or are currently under construction in these areas, ranging from 201 in Fayoum to 756 in Beheira. In other words, 31.5% of the total number of all state-led projects are concentrated in 22% of Egypt's governorates.

Contrary to governmental narratives, however, anecdotal evidence suggests that mega projects have often failed to produce the desired outputs, nor have they contributed to improving the socio-economic conditions of the impoverished communities that they purportedly intended to benefit.

A prominent example is the Berket Ghalioun Fishing and Aquaculture complex, inaugurated in 2017 and run by the National Service Projects Organization (NSPO) through its new subsidiary, the National Company for Fishing and Aquaculture, in partnership with a Chinese company. Touted as the largest fishery project in the Middle East and in Africa, it comprises

<sup>8</sup> Abdel Latif, Abla, About Egypt's Mega Projects Infrastructure & Hayah Kareema, The Egyptian Center for Economic Studies, <https://egyptwide.short.gy/rpmaaY> (last accessed December 21, 2025).

<sup>9</sup> “The National Strategy for Combating and Preventing Illegal Migration (2016-2026)”, ESCWA, October 2016, <https://nwm.unescwa.org/resources/215> (last accessed December 21, 2025).

“Signing of a Memorandum of Understanding (MoU) between NCCPIM&TIP and UNICEF”, Unicef Egypt, 11 September 2022, <https://egyptwide.short.gy/qjLrLb> (last accessed December 21, 2025).

<sup>10</sup> كالين، ستيفن، "رؤية السيسي الاقتصادية لمصر: عودة إلى المستقبل"، رويترز، 23 مايو 2014، <https://egyptwide.short.gy/Wee9Xd> (تاريخ الوصول 21 ديسمبر 2025)

<sup>11</sup> “National Awareness Raising Campaign on the Dangers of Irregular Migration”, IOM Egypt, <https://egyptwide.short.gy/CyDdaz> (last accessed December 21, 2025).

a Feed Production Plant, Fish and Shrimp Packing Plant, and a Research and Development Center, hundreds of artificial ponds, among other facilities, to serve the production of the lake. In an embodiment of the inherent conflation between the military's regulatory roles and its profit-seeking activity, the government claimed that the complex would both help curb illegal fishing and reduce local prices by increasing the fishery production in Egypt by 70 percent, also encouraging more exportation, and enabling the local economy to flourish.<sup>12</sup> However, the data shows that Egypt's total fisheries production increased from 1.7 million tons in 2016 to roughly 2 million tons in 2022.<sup>13</sup>

The unsustainability of mega projects does not concern exclusively local economies and communities; it negatively affects the national economy as well. Due to their remarkable size and the insufficient public scrutiny into their sustainability<sup>14</sup>, mega projects benefit from huge influxes of capital through untransparent state budget decisions. The opacity around mega project finances (including funding, spending, and revenues) concerns not solely the general public and the press, but also civilian state institutions, including the Parliament, and anti-corruption oversight agencies.<sup>15</sup>

While the government contracts the military to implement large public works (often without public bids or tenders), many mega projects are debt-financed, and have significantly contributed to Egypt's hard currency drain in the last decade (since 2014), driving the country to rely more and more on foreign loans.<sup>16</sup> Between 2014 and 2023, Egypt's foreign debt has increased to an unprecedented amount of over \$164 billions (almost a five-fold increase),<sup>17</sup> while much of the new loans are only used to repay existing loan debts in a vicious cycle.

This has produced serious implications on social and economic rights because Egypt's debt crisis has significantly reduced the governments' room of financial flexibility (recently, over 80 percent of the state budget went to debt repayment and services), and involved harsh austerity measures and the severe devaluation of the Egyptian Pound,<sup>18</sup> contributing to rising poverty and defunding of essential services such as in education and health care.<sup>19</sup>

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<sup>12</sup> "Ghalioun "The largest fish farming farm in the Middle East", State Information Service, 12 January 2023, <https://egyptwide.short.gy/lMdgTI> (accessed December 25, 2025).

<sup>13</sup> "Fish production in Egypt from 2009 to 2022", Statista, 29 November 2025, <https://egyptwide.short.gy/cLJ1Yz> (accessed December 25, 2025)

<sup>14</sup> "السياسي يثير جدلا جديدا: لا جدوى من دراسات الجدوى"، الجزيرة، 10 ديسمبر 2018 " تاريخ الاطلاع 25 ديسمبر 2025 ) <https://egyptwide.short.gy/SK4QcW> ، "الرئيس السيسي: "هناك مشروعات لا تحتاج دراسات جدوى وما فيش وقت نفقده"، اكسترا نيوز، 29 أكتوبر 2022 (تاريخ الاطلاع 25 ديسمبر 2025 ) <https://egyptwide.short.gy/iueOcl>

<sup>15</sup> Roll, Stephan, "Loans for the President: External Debt and Power Consolidation in Egypt", SWP Research Paper 12, Stiftung Wissenschaft und Politik (German Institute for International and Security Affairs), December 2022, <https://egyptwide.short.gy/KPuAfD> (accessed December 25, 2025).

<sup>16</sup> See, for example, "The 2025-2026 Budget: Egypt in the Grip of Debts", The Egyptian Initiative for Personal Rights, 27 May 2025, <https://egyptwide.short.gy/iYw5Df> (accessed December 25, 2025).

<sup>17</sup> Ibid.

<sup>18</sup> "Egypt: IMF Bailout Highlights Risks of Austerity, Corruption", Human Rights Watch news release, 31 January 2023, <https://egyptwide.short.gy/vwOuEf> , (last accessed December 25, 2025).

<sup>19</sup> "Egypt: Declining Funding Undermines Education", Human Rights Watch news release, 27 January 2025, <https://egyptwide.short.gy/cUDNEa> , (last accessed December 25, 2025).

## 2.1. Mega Projects in the Fishing Sector:

To understand the significance of the military's involvement in the fishing industry in Egypt, it is noteworthy that Egypt has been in the middle range of the top 20 countries worldwide, and the top country in Africa, in total fisheries production (which includes fish harvest of all sources (capture, breeding, and fish farming)). When considering aquaculture alone, Egypt ranks among the top 10 countries worldwide. Last available World Bank figures show that Egypt's total fisheries production increased from 1.7 million tons in 2016 to roughly 2 million 2019 and plateaued until 2022.<sup>20</sup>

The mega projects in the fishing sector, which constitute the focus of this research, include the development of lakes and lagoons through the Armed Forces Engineering Authority (AFEA), in addition to the establishment of numerous large-scale national farms and fishing sites. Their creation purportedly served multiple purposes: increasing fish production for domestic consumption and export; creating employment opportunities for local youth; reducing unemployment, considered a primary driver of irregular migration<sup>21</sup>.

Notably, most of such enterprises featured the involvement of the Ministry of Defense and of the Ministry of Military Production in their construction, restoration, or management through their agencies and apparatuses.

The agencies involved at various levels in fishing sector projects, which will be discussed in this report, include the National Service Projects Organization (NSPO), the National Authority for Military Production (NAMP, under the Ministry for Military Production)<sup>22</sup>, and the AFEA.

The NSPO-affiliated National Company for Fisheries and Aquaculture (NCFA), established in 2015, represents a major intermediary between the EAF and the national fish production, consolidating the army's control over the aquaculture sector. Despite its recent inception, the NCFA quickly became in charge of several large public works and projects for fish farming, packaging, and fish processing plants, a marine fish hatchery, as well as a research and development center and a laboratory, a marine fishing fleet, and commercial fishing lakes. It owns fishing boats and has led initiatives on several major lakes.<sup>23</sup>

The rise of the NCFA has proceeded in parallel to the marginalization of the competent civilian institution, the General Authority for Fish Resources Development (GAFRD), which has been legally mandated since its establishment in 1983 to develop fish resources in Egypt and to regulate the exploitation of fishing areas and aquaculture farms across water bodies. Following the establishment of the NCFA, the GAFRD was subjected to severe reductions in its budget. The civilian National Fund for Supporting the Capacities of the Fish Resources Authority was abolished, and the authority was deprived of its administrative and extension headquarters as well as its specialized laboratories, with ownership of these

<sup>20</sup> "Total Fisheries Production", World Bank Databank citing Food and Agriculture Organization (FAO), last updated 2022, <https://egyptwide.short.gy/ToPKn7> (accessed December 25, 2025).

<sup>21</sup> حامد، احمد، "أهداف المشروع القومي للاستزراع السمكي الذي أطلقه الرئيس السيسي | تفاصيل"، بوابة الأهرام (تاريخ الاطلاع 25 ديسمبر 2025) <https://egyptwide.short.gy/Sil9eL>

<sup>22</sup> This is an entity that falls officially under the Ministry of Military Production.

<sup>23</sup> The official site of The National Company for Fisheries and Aquaculture, <https://egyptwide.short.gy/x4b20X> (last accessed December 25, 2025).

assets transferred to the Ministry of Local Development. In parallel, the NCFa took over major aquaculture projects in the East of the Suez Canal, East Port Said, and Ghalioun lake, consolidating military dominance over the sector.<sup>24</sup>

In 2019, Presidential decree No.294 expanded the EAF's authority over the major Egyptian lakes (including Lake Bardawil in North Sinai, Lake Port Foua/Malaha in Port Said, Lake Manzala, Lake Burullus (in the Delta), Lake Edku, Lake Mariout (near Alexandria), Lake Nasser (in southern Egypt, and the largest in the country), as well as adjacent lands, islands, and shorelines connected to those bodies of water) by classifying them as "military-adjacent".

In areas designated as "military-adjacent" under Decree No.294 of 2019, the EAF retains the exclusive power to approve residence, construction, land ownership, economic activity, and infrastructure. The mere entry of building, farming, and fishing equipment requires military approval.<sup>25</sup> The EAF dictates restrictions on movement and entry in these areas as well as regulations related to activities such as fishing, farming, or commerce. Consequently, civilians are subject to military law, and unauthorized entry or any economic activity is to be prosecuted by military authorities. This applies to communities that already exist, live or work in those areas prior to the issuance of the decree. The decree also states that any equipment ordered to be seized in such prosecutions is to be transferred to the EAF.

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<sup>24</sup> بركات، عبد التواب، "عسكرة" الثروة السمكية في مصر"، العربي الجديد، 20 نوفمبر 2017

(تاريخ الاطلاع 25 ديسمبر 2025) <https://egyptwide.short.gy/vtHNh2>

<sup>25</sup> تعديل قرار تحديد المناطق المتاخمة لحدود جمهورية مصر العربية والقواعد المنظمة لها، منشورات قانونية

(تاريخ الاطلاع 25 ديسمبر 2025) <https://manshurat.org/node/65296>

### 3. Human Rights Impacts on Fishers and Coastal Communities

This section investigates the deliberate neglect of socio-economic and other human rights in the cases of fish-industry mega projects in Lake Ghalioun and Lake Burullus (both in the Kafr-el-Sheikh governorate), Lake Manzala (which extends across the governorates of Port Said, Sharqia, Daqahliya, and Damietta), and Lake Mariout (in the Alexandria governorate).

Crucially, some of the sites where such mega projects were installed had already been the object of nature restoration interventions, in some cases for decades. Studies indicate that previous interventions had positive effects on both lake ecosystems and food production: in the case of Lake Mariout, where nature protection interventions began in the mid-Nineties, by 2015, fish production was declared suitable for human consumption and began growing in volume, generating revenues for local fishers<sup>26</sup>. Lake Burullus, on the contrary, had witnessed a sharp deterioration in water quality and fish production since the late 2000s, but a restoration project was announced in 2012<sup>27</sup>. When the NSPO and NCFA took over, therefore, many nature restoration interventions were already underway, and the potential for economic revenues from fishing and aquaculture was evident. Through the creation of mega projects, the EAF-affiliated agencies seized the opportunity to reap the economic benefits of lake restorations, excluding civilians.



Figure 1: Geographic location of Lake Ghalioun, Lake Manzala, Lake Burullus, and Lake Mariout in Egypt, with the village of Burj Mughazal indicated. Source: Google Earth.

<sup>26</sup>Shaaban, Nashwa A. "Water quality and trophic status of Lake Mariut in Egypt and its drainage water after 8-year diversion." *Environmental Monitoring and Assessment* 194.6 (2022): 392. <https://egyptwide.short.gy/DXEuHS>

<sup>27</sup> Zingstra, Henk , "Lake Burullus Local Food Security and Biodiversity under Pressure", Centre for Development and Innovation, December 2013, <https://egyptwide.short.gy/5HBcOI> ( last accessed December 21, 2025).

### 3.1. Lake Ghalioun (Burj Mughaizal)

In 2017, President Sisi inaugurated the first phase of the Berket Ghalioun Fish Farming Complex, referred to as Lake Ghalioun, spanning about 4000 feddan,<sup>28</sup> while the total project area was intended to expand fivefold. Situated in Kafr el-Sheikh governorate in Northern Egypt, the complex is run by the NSPO, which was granted exclusive control spanning an area of approximately 9,000 feddan through Presidential decrees issued in June and July 2016. In 2022, the decrees were amended to expand the area placed under the control of the NSPO to 9,100 feddan.<sup>29</sup>

The village of Burj Mughaizal is located in Kafr El-Sheikh governorate, at the confluence of the Rosetta Nile branch and the Mediterranean Sea, about six kilometers from the Berket Ghalioun complex. The majority of the village's men, including the youth, work in professions related to the fishery industry, such as fishing, fish trading, boat trading, and manufacturing.

Due to its location, Burj Mughaizal has also been a key departure point for irregular migration and informal trade from Africa to Europe.<sup>30</sup>

Before its acquisition by the NSPO in 2017, the Ghalioun fishing complex used to be rented to fishers from surrounding villages, representing to many an important source of income and job security. From 2017, however, with the complex's acquisition and its repurposing as a military asset, fishers have been denied access to the area<sup>31</sup>.

According to interviews with local people, the Berket Ghalioun complex does not employ locals, and relies rather on military conscripts for a cheaper workforce,<sup>32</sup> as well as university graduates. Adel, one of the interviewed fishers, commented: "We are poor fishers. Some of us never completed an education, some only have primary or preparatory school certificates, but Ghalioun only hires people with university degrees."<sup>33</sup>

The Berket Ghalioun complex, established in 2017, did not provide employment opportunities for local fishers. As a result, many turned to fishing in the Mediterranean Sea. Although most still commit to abiding by all legal obligations to maintain their fishing licenses, Egyptian authorities initiated a heavy crackdown on local fishers in 2020, which led to a remarkable wave of arbitrary arrests and convictions. It began when a group of Egyptian

<sup>28</sup> The Egyptian is the unit measuring farmland in Egypt. 1 Feddan = 4200 sq meters.

<sup>29</sup> ما هو مشروع "بركة غليون" للاستزراع السمكي الذي افتتحه السيسي اليوم؟، مصر اوي، 18 نوفمبر 2017، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/11gL9F>

<https://egyptwide.short.gy/17d2BV>، غليون"، جهاز مشروعات الخدمة الوطنية، تاريخ الاطلاع 25 ديسمبر 2025

، الحكومة توافق على تخصيص 9 آلاف فدان لصالح جهاز الخدمة الوطنية"، أموال الغد، 8 يونيو 2022، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/AxA5PV>

اتحاد شباب كفر الشيخ يعقد ورشة عمل عن الهجرة غير الشرعية بمطوبس ضمن فعاليات «صيف شبابنا» | صور بوابة الأهرام، 14 يوليو 2024، تاريخ الاطلاع 25 ديسمبر 2025،

<https://egyptwide.short.gy/NFwSC3>.

<sup>31</sup> بركات، عبد التواب، "بالأرقام: مهنة الصيد المنكوبة في عهد السيسي"، مرجع سابق

، بركات، عبد التواب، "بالأرقام: مهنة الصيد المنكوبة في عهد السيسي"، العربي الجديد، 27 فبراير 2018، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/ucu2zb>

<sup>32</sup> Since at least the 1960s, conscription laws in Egypt allow using conscripts in work of non-military nature and in development work. The phenomenon escalated in the 1980s during the expansion of military business arms following the inception of the NSPO. See Abul-Magd. *Militarizing the Nation*, *ibid*.

<sup>33</sup> Interview with a fisher from Burj Mughaizal, 15 November 2024.

fishers returned from a legal fishing trip that reached the Libyan coast. Because of the COVID-19 restrictions, the fishers returned via land and were arrested under the pretext that their return trip might have been an attempt at establishing a new migration and smuggling route, according to residents interviewed.

Fishers were arrested in Salloum, on the Libya-Egypt border, in March 2020, and forcibly disappeared until June 2020, when they were charged with affiliation to a terrorist organization and arms smuggling by the Supreme State Security Prosecution,<sup>34</sup> in Supreme State Security Case No. 622 of 2020.<sup>35</sup>

Following those initial arrests, the authorities launched a heavy criminalization campaign against fishers from Burj Mughaizal. Many were arrested in airports as they were traveling back to Egypt to visit their families. Between 2020 and late 2021, security forces arrested approximately 44 men who are all residents of Burj Mughaizal, mostly working (or previously working) in the fishing industry.

Eleven of those interviewed said their relatives were arrested between March and July 2020, and four between January and September 2021. At least two were arrested at their arrival in Egyptian airports as they returned from abroad. One of them was arrested upon his arrival from Italy, where he legally resided, in January 2021, and he was forcibly disappeared until February 7, 2021, when he appeared before the State Security Prosecution and was charged with arms smuggling and affiliation to a terrorist organization. He had traveled to Italy irregularly in 2014 but had managed to obtain legal residency and employment. According to his brother Mahmoud, he "was living legally in Italy, had regularized his status, and had no connection to smuggling."<sup>36</sup>

Another fisher was arrested at the airport upon his return from Italy in 2021. He had traveled to Ireland informally in 2007 at the age of 14, and returned to Egypt in 2014, after which he traveled to Italy. Upon his return in 2021, he was arrested at the airport and charged in Case No. 622 of 2020.

Most of them have been held in Badr 1 prison, in the Badr Prison Complex, and four were transferred to the Tenth of Ramadan Prison following a group hunger strike they conducted in Badr protesting their detention conditions. According to their lawyers and families, their detention conditions appear inadequate or even inhumane. In September 2023, Alaa Fathallah Abu Heikal, one of the detainees in case No. 622 of 2020, died in custody, and to the present date, no investigation has been opened into the causes of his death.

According to a lawyer interviewed and some families, many fishers were subjected to detention in isolation from the outside world for days or weeks, and authorities failed to provide any substantial evidence to support the charges against them. The only tangible

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<sup>34</sup> SSSP is a branch of prosecution in Egypt, that is responsible for detained tens of thousands of peaceful activists without evidence of wrongdoing, often rubberstamping unsubstantiated National Security Agency's allegations and failing to investigate evidence of torture and enforced disappearance. For more, see for example. "Egypt: Permanent State of Exception: Abuses by the Supreme State Security Prosecution", Amnesty International, 27 November 2019,

<https://egyptwide.short.gy/8Jyspr> (last accessed December 21, 2025).

<sup>35</sup> ضيف، إسلام، "برج مغيزل": قرية الصيادين التي تسكنها الأحران"، السفير العربي، 27 سبتمبر 2023، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/ZVU2oP>

<sup>36</sup> interview with the brother of an arrested fisher, 9 November 2024.

connection among the approximately 44 people who have been detained in connection with the case No.622/2020 seems to be their common origin from the village of Burj Mughaizal.

Interviewees also said that lawyers were not allowed to access the case files. According to interviews with the families of the detainees, the arrested fishers work primarily in fishing and hold fishing permits and have no political or smuggling activity or any activity that violates the law. Zainab, a local resident, commented on the arrest of her husband, saying: "My husband never engaged in smuggling or any illegal activity. There was no reason for them to arrest and imprison him."<sup>37</sup> They also referred to their poor living standards and that they would not be poor if they were involved in the smuggling business.

All of them were held in pretrial detention beyond the maximum limit (24 months) set by the Egyptian Criminal Procedure Code, art. 143, without being referred to trial. Their detention is periodically renewed through a remote videoconference system that is inconsistent with due process and fair trial guarantees.<sup>38</sup>

Families also complained that their relatives were detained in several prisons far from their homes, either in Tora prison in Cairo to Badr prison northeast of Cairo, and the 10th of Ramadan detention facilities in Sharqia governorate. The distance to visit these prisons from Burj Mughaizal poses significant logistical and financial obstacles to family visits, which nonetheless represent a necessity as detainees rely on their families for receiving adequate food, clothes, medicines, and other sustenance in jail. Shaimaa, whose husband was detained awaiting trial in connection with Case No.622, said she usually needs a full week to prepare for visiting her detained husband. Some of the families said that the detained men suffer from concerning health conditions, and are not provided with adequate medical care and treatment in prison. The pattern of systemic denial of medical care and cruel treatment of inmates is well-documented across the Egyptian prison system.<sup>39</sup>

The prolonged detention of fishers has negatively impacted the economic and social conditions of their families, for whom the men's income often represented the main or sole source of sustenance. Following the arrests, their families suffered severe hardship as the resulting poverty jeopardized their access to food, healthcare, and education. This situation also placed additional burdens on the women in those families of Burj Mughaizal, particularly for families with more than one member in detention. While women navigate the strains of poverty through the narrow opportunities offered by the local context, some children drop out of school and start working to provide for their younger and elderly family members.

Zainab, whose husband was arrested and charged in Case No.622, reported that following the arrest of her husband, she was forced to find work to support the family and that she received no help from the government. Several families said they relied on charity aid or support from extended families. Others said the children suffer physical and psychological health issues due to a lack of proper nutrition and resources.

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<sup>37</sup> Interview with the wife of a fisher, 11 November 2024.

<sup>38</sup> According to the last contact with families in March 2025. EgyptWide found no news indicating the fishers were eventually sent to trial.

ضيف، إسلام، "برج مغيزل": قرية الصيادين التي تسكنها الأحران"، مرجع سابق.

<sup>39</sup> "Egypt: Abused and denied health care, prisoners' lives at risk", Amnesty International, 25 January 2021, <https://egyptwide.short.gy/wCiILF> (last accessed December 21, 2025)

سياسيون يشنون من الإهمال الطبي في سجون مصر"، العربي الجديد، 24 فبراير 2025، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/DvFUQ8>.

Families said they have submitted petitions to several official entities to review the cases of their detained relatives, but in vain. In September and October 2025, after over 4 years in detention awaiting trial, the Public Prosecution released all the fishers from Burj Mughalza who had been held in pretrial detention in connection with Supreme State Security Case No. 662 of 2020. Despite the release representing a positive turn of events, the charges pressed against fishers in case No.622 have not been dropped, and the case remains open, although the defendants and their lawyers were never confronted with any evidence or tangible proof.<sup>40</sup>

### 3.2. Lake Manzala

Stretching over nearly 125,000 feddan, Lake Manzala, situated in northeastern Egypt, is the country's largest coastal lagoon, playing a vital role in local fisheries and biodiversity. It spans across three governorates: Port Said, Dakahlia, and Damietta. It shares its eastern border with the Suez Canal, is bordered to the west by the Damietta branch of the Nile, and to the north by the Mediterranean Sea. Over the past decade, the Egyptian government has initiated several projects to rehabilitate and develop the lake, which saw significant military involvement.<sup>41</sup>

Lake Manzala has suffered for years from diminishing ecological and economic worth caused by severe pollution, climate change, and encroachment, all of which contributed to reducing the quality of its waters. To address these issues, the Egyptian government launched a project aimed at restoring the lake's health and productivity, consisting mainly of dredging.<sup>42</sup> The initiative, which was taken over by AFEA, commenced in 2017 and continued through 2022. The military's involvement in the project, however, extended well beyond supervision. The Ministry of Military Production contributed to the construction of wastewater treatment facilities and infrastructure improvements around the lake to enhance water quality, increase fish production, and restore the lake's ecological equilibrium.

The interventions focused on removing pollutants and reducing the discharge of industrial and sewage waste in the lake in an attempt to curb environmental degradation. However, a peer-reviewed study published in 2025 suggests that while the intervention led to

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<sup>40</sup>"After the Prosecution's Release of many detainees: EIPR Demands Closing Cases of Borj Meghizel fishers", Egyptian Initiative for Human Rights, 12 October 2025, <https://egyptwide.short.gy/AgiUsN> (last accessed December 21, 2025).

<sup>41</sup> "Lake Manzala", The Arab Republic of Egypt, Presidency, <https://egyptwide.short.gy/ad42Sc> (last accessed December 21, 2025).

الغزاوي، محمد، "بالصور.. بحيرة المنزلة " أكبر البحيرات الطبيعية في مصر مهددة بالفاء .. ومساحتها تنقلص من 750 ألف فدان إلى 125 ألفا فقط"، <https://egyptwide.short.gy/VSe1jE>، 14 يوليو 2014، تاريخ الاطلاع 25 ديسمبر 2025

<sup>42</sup> تطوير بحيرة المنزلة"، جمهورية مصر العربية، رئاسة الجمهورية، تاريخ الاطلاع 25 ديسمبر 2025 " <https://egyptwide.short.gy/oNy3xq>

أعمال تطهير وتكريك بحيرة المنزلة"، القوات المسلحة المصرية، تاريخ الاطلاع 25 ديسمبر 2025 <https://egyptwide.short.gy/wWaoCF>

improvements in water quality and the general health of ecosystems, the root causes of the lake water's degradation - such as the discharge of unfiltered wastewaters - have not been sufficiently addressed to ensure the long term sustainability of the intervention.<sup>43</sup> Moreover, journalistic sources report that pollution remains a pressing issue in Lake Manzala, as Industrial waste and sewage continue to contaminate the lake, rendering fish unfit for human consumption and posing health hazards to fishers.<sup>44</sup>

Similar to what happened around the Berket Ghalioun complex, the restoration of Lake Manzala and the issuance of Decree No. 294 of 2019 had significant repercussions on the local fishing communities. Local residents told EgyptWide that since 2020, the Water Surfaces and Environment Police and the Border Guard Forces restricted access to traditional fishing sites in Lake Manzala, which led to increased competition for the few options available to them.

In the villages surrounding Lake Manzala, the majority of the population works in fishing-related professions.<sup>45</sup> Restrictions on access to fishing sites undermine the local economy and the socioeconomic rights of residents. Many of the fishers interviewed by EgyptWide reported that they face difficulties in providing food, clothing, and education for their children.

Since 2020, fishers from Lake Manzala have been tried for fishing in restricted areas without valid permits under Decree No. 294 of 2019, which placed the site under military jurisdiction. This, according to the fishers' lawyers interviewed by EgyptWide, appears as an irregularity, because the decree has not yet been presented to Parliament, and no executive regulation has been issued yet to clearly delimitate the areas where fishing is prohibited, and the methods of fishing that are allowed. Nor have any offices been set up where fishers can go to obtain new fishing permits.

Mostafa, one of the lawyers, observed that "The presidential decree that classified the lakes as 'military-adjacent areas' has, to this day, never been submitted to Parliament. No executive regulations have been issued to organize the permitting process, and no offices have actually been set up to issue permits to fishers".<sup>46</sup>

The vagueness of the provision paves the way for an arbitrary enforcement of the Decree, which led to the growing criminalization of small-scale civilian fishers. In June 2022, approximately a hundred fishers from coastal villages in the governorates of Qalyubia, Damietta, and Port Said (across which the lake stretches) were arrested. Despite their civilian status, ninety of them were referred to military courts, facing charges related to violating Decree No.294 of 2019 as well as the fishing law, using unauthorized gear, and fishing in prohibited areas. According to Mostafa, one of the lawyers, never before had the

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<sup>43</sup> El Sayed, Seliem M., et al. "Evaluating the restoration of Lake Manzala after dredging using water quality parameters and zooplankton changes." *Scientific Reports* 15.1 (2025): 16306.

<https://www.nature.com/articles/s41598-025-98069-x>

وسام، أسماء، "مليارات بلا طائل... استمرار صرف المخلفات في بحيرة المنزلة رغم تكلفة التطوير"، رصيف 22، 18 فبراير 2024، تاريخ <https://egyptwide.short.gy/vb6mRj>، الاطلاع 25 ديسمبر 2025

Arafat, Nada, "A lake remade: How Manzala's waters became clear enough to fish for money", Mada Masar, 8May2025, <https://egyptwide.short.gy/i5nEfP> (last accessed December 21, 2025).

<sup>45</sup> محاكمة عسكرية لمدينين يعملون في البحر"، مصر 360، 9 أغسطس 2022، تاريخ الاطلاع 25 ديسمبر 2025" <https://egyptwide.short.gy/DRy52M>

<sup>46</sup> Interviews with one of the defense lawyers for the fishers of Al-Manzala, from 27 November to 10 December 2024.

decision to classify lakes under military jurisdiction led to such a large number of civilian fishers being arrested and tried before military courts.

In August 2022, while arrests of fishers continued, military misdemeanor courts in Mansoura, Ismailia, and Alexandria handed down sentences against more than 150 fishers from Lake Manzala, who were sentenced to six months imprisonment with suspended execution and confiscation of nets and fishing gear in relation to Cases No. 131, No. 132, No. 134, and No. 136 of 2022.<sup>47</sup>

Families also incur additional expenses when a fisher is arrested and imprisoned, in order to cover visitation costs. Marwa, the mother of a fisher charged in Case No.7702 of 2024, said: "My son is a fisher; he did nothing wrong to be arrested. He is married with three children, and now his wife has to work to support them. We can no longer afford food, education, or medical care."<sup>48</sup>

Hussein, the brother of another fisher, tried by a military court in Mansoura in relation to case No.7966 of 2024, stressed out: "I am a fisher, and my brother was a fisher too. He was taken during Ramadan, leaving his wife and children behind. Now, I have to support them along with my own family, but life is tough, and my income isn't even enough to buy bread."<sup>49</sup>

The confiscation of fishing gear upon conviction is one of the factors further aggravating the vulnerability of local fishers and their families, as such equipment is vital to their work. After release from prison, fishers whose gear has been confiscated are forced to borrow money to purchase new gear- a phenomenon now so common that, according to interviewees, it led to an increasing presence of lenders across the region. Due to the restricted access to the Lake and the decreasing fish quality, however, in most cases, fishers are unable to pay back the loans, leading to further economic vulnerability.

Unpaid debts can lead to imprisonment under Article No. 341 of the Egyptian Penal Code,<sup>50</sup> a fate which many fishers encounter when unable to pay the installment for the purchase of new fishing gear. Thus, fishers from Lake Manzala are trapped in a vicious cycle of poverty, debt, and arbitrary detention as a result of the state restoration projects, which should supposedly have revitalized the environment and the economy of their region.<sup>51</sup>

Additionally, the sentences handed down against fishers have become more severe over time, evolving from six months of imprisonment with suspended execution to two years of imprisonment with confiscation of their fishing gear. In response, residents of Lake Manzala and their lawyers demand the enactment of a policy of pecuniary sanctions for the first and second offenses, and imprisonment only for the third.

According to some residents, the fishers were arrested randomly as security agencies failed to identify those who had actually violated the new fishing regulations or lacked proper licenses and permits. The arrests appear to have been arbitrary and intended to intimidate and spread fear within the local community. Hussein, the brother of an arrested fisher, reported that "They took my brother from a café; he wasn't even fishing or near the water. He

<sup>47</sup> الجيش يستحوذ على بحيرة 'المنزلة': اعتقال 100 صياد بتهمة الصيد الممنوع"، مركز إنسان للدراسات للإعلامية، 2022، تاريخ الاطلاع 25 "ديسمبر 2025، <https://egyptwide.short.gy/JEaFOT>، مرجع سابق "مصر 360، ديسمبر 2025

<sup>48</sup> Interview with the mother of a fisher, 4 December 2024 through a phone call.

<sup>49</sup> Interview with the brother of a fisher, 4 December 2024 through a phone call.

<sup>50</sup> قانون العقوبات رقم 58 لسنة 1937، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025، <https://manshurat.org/node/14677>

<sup>51</sup> Interviews with fishers and residents of Manzala.

was just sitting at the café."<sup>52</sup>

Manar, whose husband is a fisher charged in Case No.7812 of 2024, commented: "My husband's papers were in order, and he would go out fishing every day as usual to earn money so we could buy food. He didn't do anything wrong to be imprisoned."<sup>53</sup>

Kamel, another resident, confirms: "Every two or three weeks, the police come down to round up some fishers, arrest them, imprison them, and file cases against them without any system or reason. It's all a matter of luck—some get a year, others get two."<sup>54</sup> Residents and fishers also reported that the Lakes Protection Authority refuses to grant new licenses to fishers, pushing them to embrace illegality to survive. When caught, unlicensed fishers are arrested by the Water Surfaces and Environment Police and referred to military courts on charges of working in prohibited areas. In some cases, fishers resorted to venturing into the sea and international waters, and in turn, some were arrested on charges of violating territorial waters and smuggling.

Kamel, a resident, commented on the issue saying: "Many young men from our area couldn't fish in the lake, so they went out to sea to fish and provide for their families. Some of them were arrested at sea and imprisoned."<sup>55</sup>

Fishers also reported that, in some cases, boats sank due to a lack of maintenance following the owners' loss of revenues, and fishers lost their lives. Their bodies were never recovered, and the incidents were not investigated.

According to one resident, people living in villages around the lake, and especially the fishers, believe that the tightening of security measures and arbitrary arrests against their communities could serve the purpose of facilitating the implementation of a contract stipulated in 2019 between the EAF and two international corporations- the Emirati-Egyptian firm Al-Tahadi, and an Emirati firm- for expanding the lake basin.<sup>56</sup> According to some, the military authorities might have a significant interest in restricting locals from approaching the lake due to the larger revenues offered by the deal with foreign corporations. This alleged conflict of interest might be at the root of the sidelining of small-scale fishers' right to sustenance, while revenues from leases of the fishing sites would not be shared with local communities or the civilian administrations, remaining in the hands of the EAF. Kamel, a resident, said: "We heard that the government is leasing the lake to Emirati and other rich businessmen. That's why they are arresting fishers—to intimidate them so that no one fishes, and the businessmen take control of the lake."<sup>57</sup>

In the face of declining social and economic conditions, many residents of Lake Manzala are abandoning the fishing sector to turn to low-income or informal activities, such as driving tuk-tuks, selling vegetables, or garbage collecting (usually to re-sell plastic), which do not ensure sufficient income to support their families, and potentially expose workers to health hazards. Some have left their villages and moved to cities or abroad, whether through legal

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<sup>52</sup> Interview with the brother of a fisher, 4 December 2024 through a phone call.

<sup>53</sup> Interview with the wife of a fisher, 4 December 2024 through a phone call.

<sup>54</sup> Interview with a local resident, 27 November 2024 through a phone call.

<sup>55</sup> Interview with a local resident, 29 November 2024 through a phone call.

<sup>56</sup> "شركة إماراتية تفوز بمشروع توسيع بحيرة المنزلة"، الشروق، 17 سبتمبر 2020، ت، <https://egyptwide.short.gy/wnMLn4>

<sup>57</sup> Interview with a local resident, 27 November 2024 through a phone call.

or illegal means, in the hope of better living conditions. Ali, a villager, observed: "Many young men have left the town and abandoned fishing. Some went to Cairo, Alexandria, and other big cities to find work, while others paid money to travel by boat to Italy or Turkey."<sup>58</sup>

Although the lake development project led by the AFEA was completed in 2022, the Prime Minister's Cabinet announced in April 2025 that EAF-affiliated agency Mostaqbal Masr would take over the management and operation of Lake Manzala along with other lakes.<sup>59</sup> Considered one of the main arms of the EAF in the national economy, the Mostaqbal Masr agency was established through a presidential decree in 2022, which has not been published in the Official Gazette to date.<sup>60</sup> The Authority exercises control over key economic fields and enjoys an exceptional institutional status outside the legal framework regulating conventional civilian enterprises. In 2024, its mandate was expanded to include natural lakes, and, subsequently, it has assumed control over the management of four of the country's largest lakes: Lake Nasser in southern Egypt, and Lakes Manzala, Burullus, and Bardawil in the North. Independent journalistic sources report that its administration of Lake Bardawil has involved practices that could amount to human rights abuses against fishers, including their arrest, referral to military courts, and the imposition of restrictive measures on fishing activity.<sup>61</sup>

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<sup>58</sup> interview with a local resident, 29 November 2024 through a phone call.

<sup>59</sup> Arafat, Nada, "A lake remade: How Manzala's waters became clear enough to fish for money", *Ibid.* The official account of the The Prime Minister's Office, "on his visit to the authorities' projects", 28 April 2025, <https://egyptwide.short.gy/46tgej> (accessed on 21 January 2026)

<sup>60</sup> Sayigh, Yezid. 5 December 2025. "Has Sisi Found a Competent Military Entrepreneur?", *Carnegie Endowment for Democracy*. Accessed at: <https://egyptwide.short.gy/XSA1Gr>

<sup>61</sup> عرفات، ندا، "المن الأرض اليوم؟ «مستقبل مصر»"، *مدى مصر*، 5 يونيو 2025، تاريخ الاطلاع 21 يناير 2026، <https://egyptwide.short.gy/28YIO6>

### 3.3. Lake Burullus

Lake Burullus is located in the northern Nile Delta, in the Kafr El-Sheikh Governorate, on Egypt's northern coast. It is bordered by the Mediterranean Sea to the North, separated from it by a narrow sandy strip, while to the South, East, and West it is surrounded by several villages and districts of the governorate. The lake is the second largest natural lake in Egypt, covering approximately 110,000 feddan. It was declared a natural reserve in 1998 and contains 28 islands scattered across the lake, where some fishers and local residents live.<sup>62</sup>

In recent years, Lake Burullus has seen a series of projects intended to develop fish production and restore natural habitats in the lake. Due to the decline in water quality and fish stocks recorded in the late 2000s, several initiatives were sponsored by the Egyptian government over the past decade, including interventions to clean and deepen the lake's entrances and waterways, and remove encroachments.<sup>63</sup> In 2017, the government launched a project to clean the lake and improve the aquatic environment in Burullus Lake, at a cost of 1.58 billion Egyptian pounds. The first and second phases, consisting respectively in the development and deepening an area spanning 1,808 feddan and cleaning the entrances of the lake channels, and the cleaning and deepening of the basin in an area of 1,500 feddan, the reinforcement of the channels sides, the digging of four navigational canals, and the construction of two maritime docks, have been completed, while the third phase is currently underway.<sup>64</sup> The third phase involves cleaning the Bermbal Canal in Matubas, developing and deepening an area of 3,026 feddan, opening two gates in the dam to improve water flow, and clearing seven agricultural drainage outlets.<sup>65</sup>

Fishers and residents of villages surrounding Lake Burullus, interviewed by EgyptWide, however, claim that the nature restoration projects were largely carried out without meaningful consultation with local communities who depend on the lake as their primary source of livelihood. An academic survey conducted in 2022 found that 81% of the villagers from Lake Burullus saw their economic situation deteriorate during the last few years.<sup>66</sup>

As elsewhere, deteriorating socio-economic conditions among the population take a heavier toll on its most vulnerable groups, including women and children. Some of the families whom EgyptWide talked to reported how, after losing their livelihoods, they were forced to take their

<sup>62</sup> تطوير وتطهير البحيرات الشمالية"، الهيئة العامة للاستعلامات، 2 نوفمبر 2021، تاريخ الاطلاع 25 ديسمبر 2025 " <https://egyptwide.short.gy/iFt6Th>

<https://egyptwide.short.gy/iFt6Th>

<sup>63</sup> سليمان، محمد، "إزالة 200 فدان من التعديات على بحيرة البرلس"، اليوم السابع، 22 أبريل 2011، تاريخ الاطلاع 25 ديسمبر 2025

<https://egyptwide.short.gy/Govb6I>

<sup>64</sup> رئيس الوزراء يتابع موقف أعمال تطهير وتكرية بحيرة البرلس"، الهيئة العامة للاستعلامات، 1 يناير 2024، تاريخ الاطلاع 25 ديسمبر 2025

<https://rb.gy/8ethzs>

Hassan, Noura, Mohamed, Ebtessam (2023), "The Views and Knowledge of the fishers on the Impact of Lake Burullus Development on their Community", Egyptian Journal of Aquatic Biology & Fisheries 27(1),

<https://egyptwide.short.gy/lPiDde>

<sup>65</sup> سليمان، محمد، "تطوير بحيرة البرلس على 3 مراحل"، اليوم السابع، 16 يونيو 2023، تاريخ الاطلاع 25 ديسمبر 2025

<https://egyptwide.short.gy/XKEzll>

تطوير وتطهير البحيرات الشمالية"، الهيئة العامة للاستعلامات، مرجع سابق

Hassan, Noura, Mohamed, Ebtessam (2023), "The Views and Knowledge of the fishers on the Impact of Lake Burullus Development on their Community", Ibid.

<sup>66</sup>Khalifa, Eman (2022), "Problems of fishers in The Villages of Lake Borollos in Kafr El-Sheikh Governorate"

Journal of the Advances in Agricultural Researches 27(3): 530–543.

children out of school as they could no longer secure the resources to support their education. Some of the minors were sent to work in distant cities to help provide for their families. Samir, a fisher from the area, reported: "I have three children—two boys and a girl. Two years ago, I had to take them out of school because we couldn't even afford food, let alone school expenses. I wanted my children to get an education, but what can I do?"<sup>67</sup>.

Moreover, according to fishers' accounts, the use of large dredging pumps led to the accumulation of sediments in certain areas, making the water extremely shallow and unsuitable for many fish species. Rather than improving environmental conditions, these interventions negatively affected aquatic life, as the quantity of fish available for fishing declined in several areas.

A peer-reviewed study indicates that, despite the restoration efforts put in place by the government, pollution remains a significant issue to the point that six years after the inauguration of the projects, in 2023, Lake Burullus continued to suffer from nutrient enrichment and pollutant loading, leading to deteriorating water quality and decreasing fish populations.<sup>68</sup>

Some suggested that development efforts focused mainly on engineering works while failing to address the root causes of pollution or to take into account the ecological and social dynamics governing the lake's ecosystem.<sup>69</sup>

Just as in other cases of state-led nature restoration efforts in Egypt, it is unclear what sustainability assessment may have been conducted during the projects' design, and what measures may have been taken to prevent, mitigate, and address negative environmental and social trade-offs.

Moreover, despite the increase in patrolling activities by the Water Surfaces and Environment Police around Lake Burullus, the lake still witnesses the presence of armed fish smuggling networks that assault local fishers and prevent them from fishing. Clashes between criminal networks and fishers have already produced casualties among local communities, although the number of fishers who were injured or killed remains unknown. Some fishers told EgyptWide that the smugglers moved into the Burullus area from Lake Manzala after the site was classified under military jurisdiction, pushing them to relocate their criminal activities elsewhere. Samir, a fisher, says: "These gangs originally came from Dakahlia and Damietta. They moved here after the government took control of Lake Manzala and expelled them."<sup>70</sup>

According to residents of Lake Burullus, the armed smuggling networks have progressively taken control of most of the fishing waters, and they resort to electrofishing, a technique that

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<sup>67</sup> Interview with a fisher, 11 December 2024, through a phone call.

<sup>68</sup> Al-Afify, A.D.G., Abdo, M.H., Othman, A.A. et al. (2023) "Water Quality and Microbiological Assessment of Burullus Lake and Its Surrounding Drains", *Water Air Soil Pollut* 234, 385 <https://egyptwide.short.gy/ZFtUuc>، أكتوبر 2024، تاريخ الاطلاع 25 ديسمبر 2025، InfoNile، "حجاج، سارة،" بحيرة البرلس، جنة مهددة بالخطر؟ <https://egyptwide.short.gy/p4QvqW>

الحجاج، محمد، "رصد مستويات مقلقة من "الميكروبلستيك" في بحيرة البرلس المصرية"، الجزيرة، 9 أبريل 2025، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/lFGH3o>

Khalifa, Eman (2022), "Problems of fishers in The Villages of Lake Borollos in Kafr El-Sheikh Governorate", *Ibid.*

<sup>69</sup> Hassan, Noura, Mohamed, Ebtessam (2023), "The Views and Knowledge of the fishers on the Impact of Lake Burullus Development on their Community", *Ibid.*, 69-84.

<sup>70</sup> interview with a fisher, 11 December 2024, through a phone call.

severely compromises the capacity of fish populations to regenerate, ultimately jeopardizing the survival of local species as well as the local economy.

Local residents and fishers engaged in several attempts to bring the issue to the attention of law enforcement authorities, including by filing legal reports, addressing MPs representing the Kafr El-Sheikh governorate, and submitting complaints to the Egyptian Cabinet of Ministers, but no effective steps were taken to address organized criminality in the Burullus Lake area.

According to some fishers, the Water Surfaces and Environment Police often colludes with the smuggling networks, and this might explain the sluggishness in pursuing them. Karim, a fisher, reported: "Our fishers were injured while fishing, and every time we go to file a complaint at the police station, nothing happens. The chief investigator is working with these gangs. The police patrols see them but do nothing to arrest nor stop them."<sup>71</sup>

Due to their deteriorating economic conditions, some fishers resorted to borrowing from lending companies solely to be able to provide food for their families, and, when unable to pay back the loans due to the impossibility to fish in the lake, they are subject to imprisonment. A 2023 survey published in the Egyptian Journal of Aquatic Biology and Fisheries found that many have reported difficulties in obtaining licenses and funding, further hindering their livelihoods.<sup>72</sup>

The fear of being arrested for being unable to pay back their loans pushes many to embark upon dangerous journeys to Turkey, Greece, or Italy, sometimes by relying on smuggling networks whose presence in the area has significantly increased.



### 3.4. Lake Mariout

Lake Mariout, located southwest of Alexandria, has historically been a primary source of livelihood for locals and is home to a significant portion of the region's biodiversity, spanning over 17000 feddan. From 2020, in an effort to boost fish production, the Egyptian government has embarked on initiatives to restore habitats in Lake Mariout and to establish large-scale fish farming enterprises. It is once again the EAF, which, through its affiliated agencies, has engineered and supervised the complex's construction.<sup>73</sup>

The Lakes and Fish Resources Protection and Development Agency (LFRPDA), established under Egyptian Cabinet Decree No. 146 of 2021, is the entity responsible for supervising, developing, utilizing, and protecting Egypt's lakes and their fish resources (both in inland and maritime waters), in addition to regulating fishing activities and supporting the development

<sup>71</sup> interview with a fisher, 11 December 2024, through a phone call.

<sup>72</sup> Ibid.

<sup>73</sup> "أعمال تطوير واستعادة كفاءة بحيرة مريوط"، رئاسة الجمهورية " <https://egyptwide.short.gy/CxRiVX> ، الزغبي، أحمد، "بحيرة مريوط بالإسكندرية عادت للحياة من الإهمال والجفاف"، اليوم السابع، 12 نوفمبر 2024 <https://egyptwide.short.gy/vJQrQI>

of communities engaged in the fishing sector.<sup>74</sup> Despite its formally civilian nature, the LFRPDA maintains close ties with the NCFA, and its executive director, General Al-Hussein Farhat, is an active member of the EAF.

The Authority operates in coordination with military authorities in the management of lakes located in or near strategically sensitive or military zones, including Lake Mariout, as a result of Decree No. 294 of 2019, which designated them adjacent to military zones.

The project includes the deepening of the lake basin and raising its water level from 30 centimeters to about 3 meters, thereby maintaining a higher water level throughout the year and ensuring the inflow of water from the Al-Qalaa Drain into the lake. In addition, the intervention aimed to remove bottom sediments and carry out cleaning and dredging operations.<sup>75</sup> The outcome of such interventions, however, appears questionable.<sup>76</sup>

Lawyers representing local fishers told EgyptWide that the LFRPDA refuses to issue or renew fishing licenses and permits for fishers without prior notice and without any official announcement, compromising their livelihoods.<sup>77</sup> Many fishers reported that the introduction of new fishing regulations and the difficulties in obtaining or renewing fishing licenses have put significant strain on their businesses. Some resorted to keeping fishing without a valid license, and when caught by the Water Surfaces and Environment Police, they were arrested and referred to military courts. According to a complaint submitted by the fishers of Lake Mariout to the Egyptian Cabinet of Ministers, which EgyptWide reviewed, the establishment of the mega project on Lake Mariout and decree No. 294 of 2019 have stripped hundreds of fishers and their families of their only source of livelihood. Many voiced the wish for the Authority to issue fishing licenses for small-scale businesses, and demanded that arbitrary arrests cease.

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<sup>74</sup> <https://www.lfrpda.org/>، جهاز حماية وتنمية البحيرات والثروة السمكية، الموقع الرسمي، تاريخ الاطلاع 25 ديسمبر 2025  
،قانون حماية وتنمية البحيرات والثروة السمكية رقم 146 لسنة 2021، تاريخ الاطلاع 25 ديسمبر 2025  
<https://egyptwide.short.gy/JkdoPv>

<sup>75</sup> أعمال تطوير واستعادة كفاءة بحيرة مريوط"، رئاسة الجمهورية، مرجع سابق"

<sup>76</sup> El-Gayar, Ensaf E., Hussein A. El-Naggar, and Walaa M. Elfiky. (2023) "Environmental Impact Assessment of Aquaculture Practices Using Zooplankton in Lake Mariout, Alexandria, Egypt." *Egyptian Journal of Aquatic Biology & Fisheries* 27 (4 ).

<sup>77</sup> Interview, 2025.

## 4. Fishers and Migration: Escaping Poverty by Design

International migration in search of better employment conditions is not a new phenomenon in Egypt, nor is it limited to Egyptians. In addition to migrating internally, Egyptians have been moving to Gulf Cooperation Council (GCC) countries for decades. Despite being the fourth most populous country in Africa, Egypt ranks first in Africa and 20th globally as a country of origin in migration. Economic conditions and lack of opportunities remain the most influential drivers of this trend.<sup>78</sup>

In recent years, more Egyptians are migrating to Europe, driven by intertwined economic, social, and political factors, making motivations complex. In 2022, Egyptians were the largest nationality among irregular migrants arriving by sea to Europe, though numbers decreased in 2023 and 2024. The Western Balkan route has increasingly been used by Egyptians, previously uncommon before 2024.<sup>79</sup>

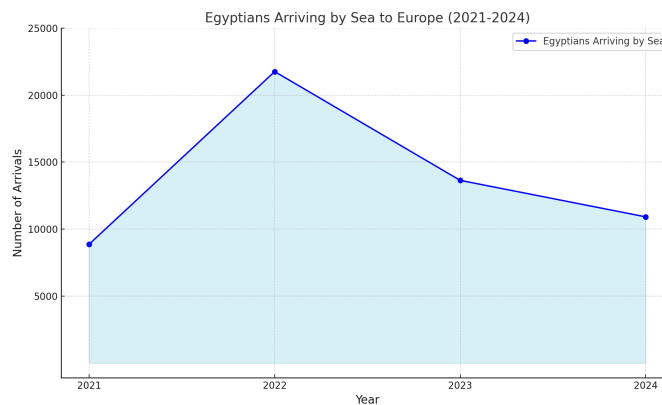


Figure 4 - Egyptian Migration to Europe by Land, based on the IOM's Mixed Migration Flow to Europe reports from 2021 to 2024

The Egyptian government has sought to address irregular migration via legislation, institutional frameworks, and international cooperation. Law No. 82 of 2016 criminalizes migrant smuggling while protecting victims, leading to the creation of the National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons (NCCPIM&TIP). Egypt also launched the “National Strategy on Combating Illegal Migration 2016–2026” to improve information, mobilize resources, and offer alternatives to irregular migration. Two bodies, supported by IOM Egypt- the Migration Data Analysis Unit in CAPMAS (2017) and the Migration Research and Studies Unit at Cairo University (2021)- were also created.<sup>80</sup>

<sup>78</sup> McAuliffe, M. and L.A. Oucho (eds.), “World Migration Report 2024”. International Organization for Migration (IOM), Geneva, 2024.

<sup>79</sup> Schwarz, Anna, “Migration agreement with Egypt: EU backing the wrong horse”, Heinrich-Böll-Stiftung, 22 March 2024, <https://egyptwide.short.gy/GNT2wk>. (last accessed December 21, 2025).

“Over 69,000 migrants arrive in East Med as Cyprus faces rising numbers”, KNEWS, 16 JANUARY 2025, <https://egyptwide.short.gy/Mpbvlz>. (last accessed December 21, 2025).

“ICMPD Migration Outlook 2025”, International Center for Migration Policy Development.

<sup>80</sup> “The National Strategy for Combating and Preventing Illegal Migration 2016-2026”, The National Coordinating Committee for Combating and Preventing Illegal Migration and Trafficking in Persons, Egypt. IOM STRATEGY FOR EGYPT (2021–2025), IOM.

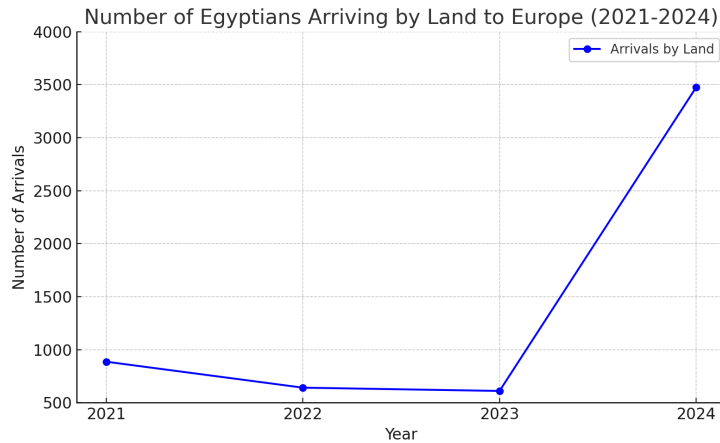


Figure 3 - Egyptian Migration to Europe by Sea based on the IOM's Mixed Migration Flow to Europe reports from 2021 until 2024

Joint initiatives were launched by the Egyptian government in partnership with the MENA branch of the IOM, such as the 2017 National Awareness Raising Campaign on the Dangers of Irregular Migration, and the campaign "Your Family, Your Dream, Your Life", jointly sponsored by the IOM and the Egyptian government with the aim to sensitize Egyptian youth to the risks associated with irregular migration. Such initiatives, however, fall short of addressing the root causes of irregular departures, such as economic constraints and political repression, nor do they provide potential migrants with viable economic alternatives.<sup>81</sup> Instead, such programs focus on deterrence through "awareness initiatives" highlighting the dangers of irregular migration.

The Berket Ghalioun complex examined in the previous section exemplifies this approach. The inauguration of the Berket Ghalioun in 2017 complex was announced by state authorities and the press as a step towards curbing irregular migration, thanks to its capacity to multiply employment opportunities in an area used as a departure point.<sup>82</sup> Despite the triumphal announcement of the eradication of irregular migration from the Kafr el-Sheikh governorate in 2018, in the following years, significant efforts and resources kept being poured into combating irregular departures from the region.<sup>83</sup> In September 2022, a conference was held at the Youth Center of Burj Mughaizal, a village bordering the Ghalioun complex, on the dangers of irregular migration and how to combat the root causes of the phenomenon.<sup>84</sup> In October 2023, a similar event took place in a neighboring town, Burullus,

<sup>81</sup> "National Awareness Raising Campaign on the Dangers of Irregular Migration Launched in Egypt", IOM, 25 September 2017, <https://egyptwide.short.gy/kpinMA> (last accessed December 21, 2025).

<sup>82</sup> علي، أحمد، "برلماني: مشروع 'بركة غليون' يقضى على عوامل الهجرة غير الشرعية" مصر اوي.كوم، 18 نوفمبر 2017، تاريخ الاطلاع 25 ديسمبر 2025، <https://bit.ly/456T0cb>

أبو كيلة، ضياء، "كيف تخلصت كفر الشيخ في عام من شبح الهجرة غير الشرعية؟" بوابة أخبار اليوم، 22 فبراير 2018، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/XBfHOD>

<sup>83</sup> أبو العينين، مجدي، "ندوة بمركز شباب برج مغيزل في كفر الشيخ حول مخاطر الهجرة غير الشرعية"، المصري اليوم، 11 سبتمبر 2022، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/NuMFlk>

عنز، مصطفى، "شباب كفر الشيخ تناقش آليات مواجهة الهجرة غير الشرعية في ندوة بالبرلس"، الوطن، 11 أكتوبر 2023، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/RtxEJA>

هيكل، محمود، "ندوات تثقيفية توعوية حول أضرار الهجرة غير الشرعية بكفر الشيخ"، بوابة روز اليوسف، 22 ديسمبر 2023، تاريخ الاطلاع 25 ديسمبر 2025، <https://egyptwide.short.gy/bhRT6y>

<sup>84</sup> أبو العينين، مجدي، "ندوة بمركز شباب برج مغيزل في كفر الشيخ حول مخاطر الهجرة غير الشرعية"، مرجع سابق

at the local Youth Center.<sup>85</sup> In December 2023, the University of Kafr El-Sheikh organized a series of conferences at the Culture Palaces in Burullus to address the same issue.<sup>86</sup>

These efforts further intensified in 2024, following an announcement made by the Egyptian State Information Service in March 2024 that a media campaign was going to be launched in April of the same year, targeting villages and towns with a high rate of irregular departures.<sup>87</sup> In the context of this initiative, in May 2024, the Ministry of Manpower sponsored a conference in Kafr El-Sheikh to address the dangers of irregular migration. In July 2024, a civil society group called “the Youth Coalition of Kafr El-Sheikh” organized a summer workshop to raise awareness about the dangers of irregular migration, in line with government auspices.<sup>88</sup>

All such events targeted young people in the governorate, whether through youth centers, culture palaces, or universities, with the aim of “informing” them of the risks faced by irregular migrants, and the negative repercussions of irregular migration on the local economy. None of these initiatives, however, included the creation of employment or training opportunities that could sustain the local youth in building their future in Kafr el Sheikh, and none addressed the detrimental effect of the military acquisition of the Berket Ghalioun complex on the local economy and the livelihoods of the communities that depended on the lake for their sustenance.

The European Union, too, has a long history of migration cooperation with Egypt, intensifying in recent decades under the European Neighbourhood Policy (ENP), the EU-Horn of Africa Migration Route Initiative (Khartoum Process), and the NDICI, alongside bilateral cooperation projects. In March 2024, the EU and Egypt signed a €7.4 billion macro-financial aid agreement, with €200 million allocated for migration management. The EU’s approach, too, however, is centered around deterrence and law enforcement, with no comprehensive strategy to address structural causes such as the erosion of socio-economic rights and the militarization of the economy.<sup>89</sup>

Despite increased patrolling along Egypt’s northern coast, human smuggling networks have adapted, using desert routes to Libya via Matrouh or fishing boats’ storage areas to reach Libya and Europe<sup>90</sup>. Local residents interviewed by EgyptWide identify three main hotspots for sea departures: Burullus, Burj Mughazal in Kafr El-Sheikh, and Damietta. Mega projects under EAF control in the first two locations have worsened unemployment and poverty, pushing residents towards the informal economy or irregular migration as the sole route to a decent living standard.

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<sup>85</sup> عزز، مصطفى، “شباب كفر الشيخ تناقش آليات مواجهة الهجرة غير الشرعية في ندوة بالبرلس”، مرجع سابق

<sup>86</sup> هيكل، محمود، “ندوات تثقيفية توعوية حول أضرار الهجرة غير الشرعية بكفر الشيخ”، مرجع سابق

<sup>87</sup> أبريل المقبل.. حملة إعلامية للتوعية بمخاطر الهجرة غير الشرعية بكفر الشيخ (2024) مصراوي.كوم

Available at: <https://egyptwide.short.gy/Hvt8VO>

<sup>88</sup> سعدة، عمرو، “اتحاد شباب كفر الشيخ يعقد ورشة عمل عن الهجرة غير الشرعية بمطوبس ضمن فعاليات «صيف شبابنا» | صور، بوابة

<https://egyptwide.short.gy/jjg3UH>، الأهرام، 14 يوليو 2024، تاريخ الاطلاع 25 ديسمبر 2025

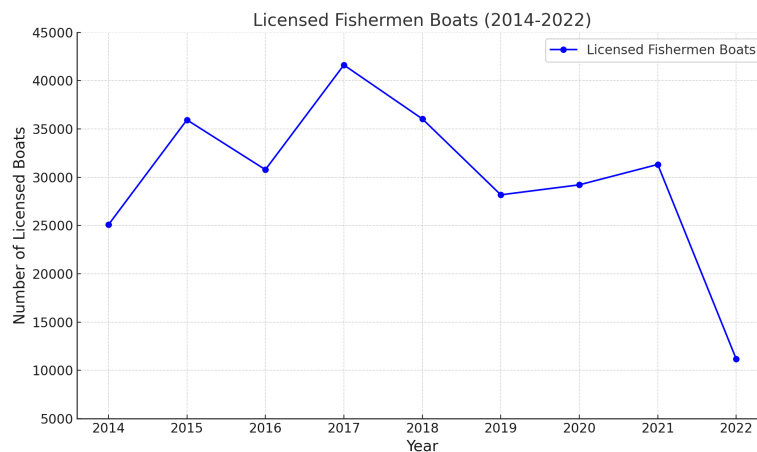
<sup>89</sup> “Official Violators: Egypt-Italy Police Cooperation and in Human Rights Violations”, EgyptWide for Human Rights, 15 June 2022. <https://egyptwide.short.gy/hH4z3h> (last accessed December 21, 2025).

“European support for Egypt: billions of euros for a dictatorial “partner” in migration control”, STATEWATCH, 27 March 2025, <https://egyptwide.short.gy/xedrnR> (last accessed December 21, 2025).

<sup>90</sup> “Egypt among top African countries for irregular migration to Europe, mostly via Libya: Frontex”, Ahram online, 4 Jan 2026, <https://egyptwide.short.gy/ZQa8EP> (last accessed January 10, 2026).

“How Egypt Became The New Hub For Human Trafficking”, WORLD CRUNCH, 17 September 2016, <https://egyptwide.short.gy/TwRwKE> (last accessed December 21, 2025).

The lake development projects in Ghalioun, Manzala, Burullus, and Mariout have failed to deliver the employment opportunities originally promised to young people and fishers in local communities, and they have not succeeded in curbing irregular migration, particularly among fishers and youth in these areas. Locals face increasingly severe restrictions on fishing activities, sometimes to the point of being prevented from practicing fishing altogether, and therefore losing their primary source of income and livelihood for their families. In addition, they are subject to complex bureaucratic and financial constraints related to the renewal of fishing licenses. Data from the Central Agency for Public Mobilization and Statistics (CAPMAS) show a sharp decline in the number of licensed fishing boats in 2022, dropping to around 11,000—the lowest level since 2014. No official data have yet been published for 2023–2024.<sup>91</sup>



*Figure 5 - Number of Licensed fishers' boats in Egypt between 2014 and 2022 based on the Central Agency for Public Mobilization and Statistics (CAPMAS)*

As a result, many fishers are forced to abandon the profession and seek alternative forms of employment. Some resort to internal migration, moving to urban centers in search of livelihoods and job opportunities that the fishery development and lake rehabilitation projects were supposed to provide in their home regions. Others turn to irregular migration, attempting to reach Italy, Greece, and other European countries using fishing boats operating in territorial waters. Fishers are fully aware of the dangers associated with irregular migration, including the risks of kidnapping, extortion, inhumane treatment, drowning, and eventual detention or deportation back to Egypt.

These risks however, do not deter attempts at irregular migration, particularly amid the worsening impacts of the current economic crisis, the economy's inability to generate sufficient demand to absorb the labor force, and the failure of state-led projects to improve fishers' living conditions.<sup>92</sup> Consequently, Egypt continues to rank among the countries with high levels of irregular migration, a trend that has intensified following the emergence of the Western border as a new route for migration via the Libyan coast.

<sup>91</sup> "A.R.E - Annual Bulletin of Fish Production 2022", CAPMAS, 2022, <https://egyptwide.short.gy/z7weih> (last accessed December 21, 2025).

<sup>92</sup> "How Egypt Became The New Hub For Human Trafficking", WORLDCRUNCH, Ibid.

## 5. Legal Framework

This section provides a legal analysis of the development of fishing and aquaculture mega projects on Lake Ghalioun, Lake Manzala, Lake Burullus, and Lake Mariout, and the pattern of human rights violations against local communities documented in this report. Framing the militarization of the economy as a process of accumulation and progressive erosion of the separation of powers and civilian participation in economic governance, this chapter highlights the systematic nature of the violations stemming from the militarization of the Egyptian economy, based on the international treaties ratified by Egypt (most notably, the International Covenants on Civil and Political Rights and on Economic, Social, and Cultural Rights, the Universal Declaration of Human Rights, the UN Convention against Corruption, and the principles of judicial independence and good governance), as well as the UN General Principles on Business and Human Rights.

### 5.1. Legal Foundations of the Militarization of the Egyptian Economy

The legal foundations of the militarization of Egypt's economy were laid long before the current crisis. From the Nasser era (1956-1970) onwards, multiple policy reforms expanded the economic prerogatives of the armed forces, preparing the terrain for the concentration of power and wealth in the hands of the EAF we witness today. It was, however, under Sisi's presidency that the military presence in the economy reached unprecedented expansion, particularly through government-led policy reforms, and the creation of ad-hoc institutions which placed strategic economic sectors under direct and indirect military supervision.

Law No. 204 of 1957 granted the EAF major fiscal privileges by exempting the Ministry of Defense and its affiliated entities from taxes, fees, and regulations related to arms contracts and customs duties.<sup>93</sup> Law No. 186 of 1986 expanded these exemptions to include the Ministry of Military Production and the Arab Organization for Industrialization, covering imports of equipment, vehicles, medicines, non-combat materials, and weapons, allowing tax-free importation and trade for decades.<sup>94</sup>

In parallel, a legal foundation was laid to exempt the armed forces' assets and activities from external audit, oversight, accountability, and civilian supervision, including Parliament and the Ministry of Finance. Decree No. 263 of 1956, issued by Gamal Abdel Nasser as Prime Minister, exempted military "secret stores" from inspection by the Audit Bureau and the Ministries of Finance and Economy, assigning oversight instead to the Ministry of Defense, a precedent that probably enabled the long-term exclusion of military bodies from civilian audit.<sup>95</sup>

Military authority over state lands is another area where the EAF's dominance was progressively entrenched through policy reforms that eroded civilian oversight and public

<sup>93</sup> إعفاء العقود الخاصة بالتسليح من الضرائب و الرسوم و القواعد المالية"، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025 " <https://manshurat.org/node/40578>

،قانون تنظيم الإعفاءات الجمركية رقم 186 لسنة 1986"، منشورات قانونية، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025 " <https://manshurat.org/node/11802>

<sup>95</sup> Sayigh, Yezid. *Owners of the Republic: An Anatomy of Egypt's Military Economy*. Ibid.

scrutiny. Presidential Decree No. 143 of 1981 (the so-called Desert Land Law)<sup>96</sup> broadened the definition of desert land to include all unregistered areas not recorded as owned by individuals or legal entities, covering over 90% of Egypt's soil. The decree granted the Minister of Defense authority to designate strategic areas whose ownership or use required his approval. Subsequent amendments in 1988, 1991, 1995, and 2001 further expanded military control over public lands and their exploitation. Decree No. 143 of 1991 was followed by Law No. 531 of 1981, establishing the Armed Forces Land Projects Agency, authorized to retain and allocate revenues from military-owned properties, particularly in desert and border areas.<sup>97</sup>

In 1988, a decree was issued by the Prime Minister's office requiring various ministries and bodies to obtain permission from the Ministry of Defense to operate in areas it considered of military significance. Law No. 7 of 1991 consolidated and updated this authority by requiring newly established public economic bodies to also coordinate their planned land uses and zoning with the Ministry of Defense.<sup>98</sup> The law also granted the President additional authority in designating desert areas as strategic zones of military importance.

However, a major shift occurred with Presidential Decree No. 152 of 2001, which empowered the Ministry of Defense to define "strategic areas of military importance" in desert lands, including areas allocated for commercial investment as well as military use.<sup>99</sup> The decree granted the army broad authority to regulate civilian construction around these areas and impose technical conditions, as well as to determine land use and change it from military to commercial purposes. As a result, all state and private entities were required to obtain prior military approval for work in desert areas, strengthening the army's ability to collect coordination fees and exercise quasi-monopolistic control over land use. This entrenched the EAF's role as a major economic actor in urban development and investment projects, while expanding presidential and ministerial discretion over land allocation without accountability.

The impact of this framework is exemplified by Presidential Decree No. 233 of 2016, which designated 21 "national roads" as strategic areas of military importance, effectively granting the Ministry of Defense exclusive commercial concessions along these routes.<sup>100</sup> Later that year, amendments to the Military Judiciary Law expanded military court jurisdiction to incidents in civilian areas managed by military bodies. Earlier legislation in 2014 had placed public and vital facilities under military jurisdiction, later extended to 2021.

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<sup>96</sup> قانون الأراضي الصحراوية رقم 143 لسنة 1981، منشورات قانونية، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025 "2025"

<https://manshurat.org/node/259>

قواعد التصرف في الاراضي والعقارات التي تخليها القوات المسلحة وتخصيص عاندها لإنشاء مدن ومناطق عسكرية بديلة، منشورات

قانونية، تاريخ الاطلاع 25 ديسمبر 2025

<https://manshurat.org/node/12906>

<sup>98</sup> Sayigh, Yezid. *Owners of the Republic: An Anatomy of Egypt's Military Economy*. Ibid.

تحديد المناطق الاستراتيجية ذات الأهمية العسكرية من الأراضي الصحراوية والقواعد الخاصة بها، منشورات قانونية، تاريخ الاطلاع 25

ديسمبر 2025 <https://manshurat.org/node/37900>

الجالى، محمد، "قرار جمهورى بتخصيص أراضى لوزارة الدفاع واعتبارها من المناطق الاستراتيجية"، اليوم السابع، 9 يونيو 2016، تاريخ

الاطلاع 25 ديسمبر 2025،

<https://egyptwide.short.gy/S5AWKJ>

Mamdouh, Rana, "Normalizing the military judiciary: How the constitutional amendments bring the Armed Forces into Egypt's judicial system", Mada Masar, 7 August 2019,

<https://egyptwide.short.gy/a7EQk4> (last accessed December 21, 2025).

Presidential Decree No. 446 of 2015 represented another significant turning point, as it authorized the Armed Forces Land Projects Agency to use its assets as its share of capital in the formation of joint ventures with domestic and foreign companies.<sup>101</sup> Exactly one month later, Presidential Decree No. 127 introduced the authorization for any state entity to establish joint-stock companies after obtaining the approval of the Egyptian Cabinet of Ministers,<sup>102</sup> paving the way for the proliferation of military enterprises and joint ventures.

Similarly, through Presidential decrees, the coastal areas and the waters of Lake Ghalioun, Lake Manzala, Lake Burullus, and Lake Mariout were allocated to the NSPO, represented by NCFa, to be used by the EAF in aquaculture projects.

Presidential Decrees No. 270 and 313 of 2016 allocated respectively 2,815.14 and 6,174 feddan in Lake Ghalioun to the NSPO, while Presidential Decree No. 332 of 2016 designated 107 acres in the Diba Triangle, west of Port Said, for aquaculture under the supervision of the NSPO.<sup>103</sup> Decree No. 294 of 2019 designated the lakes of Bardawil, Manzala, Burullus, Edku, Mariout, and Nasser, as well as their shorelines and surrounding roads, as military-adjacent areas. The decree also granted military courts jurisdiction over crimes committed within the areas, and it prohibits the introduction of any drilling, landfill, or fishing equipment into the lakes without a permit from the competent military authorities. The use of motorboats without a permit is also prohibited. The EAF is also designated to enforce the provisions contained in the decree, collapsing their role as economic regulators, law enforcement, and security authority.<sup>104</sup>

The 2019 constitutional amendments, approved by a Parliament that progressively ceded its legislative powers to the executive authority, paved the way for this structural shift. The amendments granted the President of the Republic expanded powers, extended his term in office, and, more importantly, broadened the scope of military jurisdiction and law, enabling the trial of civilians in military courts. This established the foundation for the issuance of decisions such as Decree No. 294 of 2019, which subjects civilians to military jurisdiction in areas classified as "military-adjacent". This undermines the fundamental right to a trial before an independent and impartial civilian judiciary, a cornerstone of the rule of law, and it is further aggravated by making the appointments of heads of judicial bodies subject to presidential approval, limiting the judiciary's independence as a key mechanism for checks and balances on the executive authority.<sup>105</sup>

<sup>101</sup> تعديل قرار تنظيم قواعد التصرف في الأراضي والعمارات التي تخليها القوات المسلحة"، منشورات قانونية، 2019، تاريخ الاطلاع 25 "2025

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<https://egyptwide.short.gy/fdCdHl>

، بركات، عبد التواب، "عسكرة الأسماك (2/3)"، الجزيرة، 11 نوفمبر 2017، تاريخ الاطلاع 25 ديسمبر 2025

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تعديل قرار تحديد المناطق المناخمة لحدود جمهورية مصر العربية والقواعد المنظمة لها"، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر "2025

<https://manshurat.org/node/65296>

<sup>105</sup> "Proposed Amendments to the Egyptian Constitution: Enshrining Autocracy", The Arab Center for Research and Policy Studies (ACRPS), 17 February 2019,

<https://egyptwide.short.gy/8ArYF4> (last accessed December 21, 2025)

The decision to place lake and coastal areas under the authority of Border Guards and the EAF opened the door for the trial of local fishers in military courts and their imprisonment without clearly defined guarantees of fair treatment. The ambiguity of Decree No. 294, whose scope of application is yet to be clearly defined and delimited through executive bylaws, also paved the way for other human rights violations and the imposition of penalties that appear disproportionate to the defendants' behaviour, such as prison sentences up to two years, and the confiscation of fishing equipment.

Jurisdiction is a key pillar of the military economy. The legal exclusion of all military personnel and entities, including companies, from civil laws and courts places military economic and commercial activities in an ambiguous legal space. As a consequence, civilian matters occurring in areas under military jurisdiction, such as traffic violations, accidents, offenses against public and private facilities along highways designated as military zones, and unauthorized encroachment on state land or Nile banks, fall under military courts. The military penal code does not define the rights of civilian actors, nor does it grant them adequate guarantees in economic or judicial disputes with military entities, depriving businesses, investors, and individuals of judicial recourse against military bodies as contractors, partners, or issuers of contracts, denying civilians access to legal remedies.<sup>106</sup>

The accumulation of legal frameworks has entrenched the autonomy of the military's economic institution, granting it broad fiscal exemptions and commercial privileges- most notably immunity from civilian oversight and external auditing. These provisions have enabled the military to monopolize vast public assets, particularly land, and conferred upon the Ministry of Defense the authority to award contracts through direct assignment. As a result, the military's economic influence has expanded at the expense of transparency and accountability, reinforcing its control over public resources and the terms of their allocation and use.

This process has reinforced the military's economic control over the lakes region and the aquaculture sector in Egypt by transferring regulatory and oversight powers to the EAF. Consequently, army-affiliated regulatory agencies now have complete control over these water bodies, meaning that any investment activity in these areas requires permission from the EAF, which strengthens the monopoly and drives civilian competitors out of the market.<sup>107</sup>

The concentration of economic and administrative powers contradicts the principles of good governance based on participation, accountability, and transparency. It also violates Egypt's obligations under the International Covenant on Economic, Social, and Cultural Rights, the United Nations Convention against Corruption, and the Egyptian Constitution, particularly Article 27, which emphasizes preventing monopolies and ensuring equal opportunities to citizens and economic actors.<sup>108</sup>

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<sup>106</sup> Sayigh, Yazid, "Retain, Restructure, or Divest? Policy Options for Egypt's Military Economy",Ibid.

<sup>107</sup> تعديل قرار تحديد المناطق المتاخمة لحدود جمهورية مصر العربية والقواعد المنظمة لها"، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025، <https://manshurat.org/node/65296>

منافسة الشركة الوطنية للثروة السمكية التابعة للجيش لأصحاب المزارع الخاصة.. نقاش مفتوح"، الموقف المصري، 17 أبريل 2021، تاريخ الاطلاع 25 ديسمبر 2025،

<https://egyptwide.short.gy/bnDkyi>

<sup>108</sup> "الدستور المصري المعدل 2019"، منشورات قانونية، تاريخ الاطلاع 25 ديسمبر 2025، <https://manshurat.org/node/14675>

Overall, these violations reflect a pattern of institutional overreach that undermines the civilian nature of the state, erodes public trust in its institutions, and marginalizes the most affected groups, such as fishers. This dynamic has contributed to a structural shift in Egypt's development model, with far-reaching negative social and economic consequences.

This state of things also runs counter to international frameworks and guidelines in matters of business conduct, most prominently to the United Nations Guiding Principles on Business and Human Rights (UNGPs). Principles No.3 and No.8 of the UNGPs emphasize that states and their regulatory agencies and apparatuses are responsible for ensuring the alignment of economic policy and business conduct with international human rights standards.<sup>109</sup> Principle No.13 further outlines the responsibility of economic entities, including both private and state-owned or affiliated enterprises, as follows:

- a. "Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur;
- b. Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts".

## 5.2. Human Rights Violations Against Fishers and Coastal Communities

Lake development projects and the accompanying military penetration of the fishery sector reveal a clear pattern of executive and military overreach into the powers of the legislative authority, alongside the marginalization of civilian oversight and accountability mechanisms. This has undermined the principle of separation of powers and weakened transparency and public participation in economic governance.

One of the most prominent violations is the issuance of fundamental laws and decisions through presidential decrees, without following ordinary legislative procedures or subjecting them to parliamentary debate, which directly undermines the rule of law and the principle of separation of powers.

The expansion of military courts' jurisdiction to civilian areas and civilians themselves likewise represents a violation of the principles of natural justice and the right to be tried before one's natural judge, as affirmed in the International Covenant on Civil and Political Rights and the UN Basic Principles on the Independence of the Judiciary (1985).<sup>110</sup> The broadening of military jurisdiction over civilian matters has advanced in parallel to the military's growing involvement in democratic institutions, marked by the 2014 constitutional amendments.<sup>111</sup>

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<sup>109</sup> "Guiding Principles on Business and Human Rights", United Nations, <https://egyptwide.short.gy/5s2Oll> (last accessed December 21, 2025).

<sup>110</sup> "International Covenant on Civil and Political Rights", United Nations, <https://egyptwide.short.gy/6wu6ld> (last accessed December 21, 2025).

"مبادئ أساسية بشأن استقلال السلطة القضائية"، جامعة منبوسنا، مكتبة حقوق الإنسان " <https://hrlibrary.umn.edu/arab/b050.html> (last accessed December 21, 2025).

<sup>111</sup> "Proposed Amendments to the Egyptian Constitution: Enshrining Autocracy", The Arab Center for Research and Policy Studies (ACRPS), Ibid.

A key example is Presidential Decree No. 294 of 2019, which has not been presented to Parliament to date, reflecting a clear lack of legislative transparency. This contradicts Article 25 of the International Covenant on Civil and Political Rights,<sup>112</sup> which stresses citizens' right to participate in the conduct of public affairs, as well as Article 21 of the Universal Declaration of Human Rights,<sup>113</sup> which affirms that the will of the people is the basis of government authority. Sidelining the Parliament, as the elected representative of the popular will, constitutes a fundamental breach of the rule of law and the principle of separation of powers. It also conflicts with the provisions contained in Art. No.5 and 10 of the Egyptian Constitution, which respectively establish the separation of powers, and vest exclusive legislative authority in the Parliament.<sup>114</sup>

Decree No.294 also circumvents Law No. 146 of 2021 on the Protection and Development of Lakes and Fish Resources, the civilian legal framework governing fishing activities, a further violation of the rule of law. Despite provisions guaranteeing fishers' rights to organization and access to fair licensing procedures, subsequent executive decisions defining the scope of application of Law No.146 have disregarded the safeguards intended to protect the rights of fishers. Instead, strict restrictions were imposed on the issuance of fishing licenses, placing large numbers of fishers in a state of permanent legal vulnerability and exposing them to prosecution and penalties. Such practices violate the principle that the State itself must be bound by the laws it enacts and run counter to United Nations principles on the rule of law and the separation of powers.<sup>115</sup>

### **Violations of Civil and Political Rights:**

Lake fishers have suffered numerous violations of their civil and political rights, particularly in the context of military trials of civilians, arbitrary arrests, unlawful detention and enforced disappearances, arbitrary accusations uncorroborated by evidence, and inhumane detention conditions.

Article 14 of the International Covenant on Civil and Political Rights<sup>116</sup> guarantees every individual the right to have their case heard by a competent, independent, and impartial court established by law. Although military trials are intended to cover purely military matters, the enlargement of military jurisdiction to include civilians charged with offenses related to fishing or maritime law violations constitutes a clear breach of their right to a fair trial before a civilian court. Military courts often fail to ensure defendants' fair trial guarantees, such as public hearings, full judicial independence, and the right to appeal to a civilian authority, violating their right to legal defense and to a fair trial.

Moreover, Article 9 of the Covenant prohibits any arbitrary arrest or detention and requires that detainees be promptly informed of the reasons for their detention and allowed to

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<sup>112</sup> "International Covenant on Civil and Political Rights", United Nations, Ibid.

<sup>113</sup> "Universal Declaration of Human Rights", United Nations, <https://egyptwide.short.gy/HN4RW1> ( last accessed December 21, 2025).

<sup>114</sup> الدستور المصري المعدل 2019، "مرجع سابق".

<sup>115</sup> "Rule of Law and Democracy: Addressing the Gap Between Policies and Practices", United Nations, 31 December 2012, <https://egyptwide.short.gy/ltBcyG> ( last accessed December 21, 2025).

<sup>116</sup> "International Covenant on Civil and Political Rights", United Nations, Ibid.

challenge its legality.<sup>117</sup> In many of the cases we documented, fishers were arrested without any arrest warrants, on unclear legal grounds, and detained for varying periods of time without referral to civilian courts or access to legal counsel, which qualifies the detention as arbitrary. Concerning pretrial detention, Article 9(3) of the Covenant<sup>118</sup> requires that detainees be tried within a reasonable period or released on bail. In Egypt, however, pretrial detention is frequently used punitively rather than as a temporary measure, often far longer than the maximum legal term, which stands at 24 months.<sup>119</sup> In the cases we documented, detention was regularly renewed without actual investigations or new evidence, violating the defendants' right to a fair trial within a reasonable time.

The fishers whose families or lawyers spoke with EgyptWide have also suffered enforced disappearances and other severe human rights violations, including the right to life (Article 6), personal freedom (Article 9), and the prohibition of torture (Article 7).<sup>120</sup> Families have reported being unaware of the whereabouts of their detained relatives, as well as of the authorities in charge of their detention, for long periods before they later appeared in prosecution records, a practice that may constitute a crime under international law, particularly if conducted with official knowledge or complicity of state judicial authorities.

The presumption of innocence enshrined in Article 14 of the Covenant<sup>121</sup> requires the presentation of clear evidence prior to prosecution. In many of the documented cases, fishers were charged with broad violations of fishing and maritime laws, such as fishing without a license, despite the absence of any effective mechanisms to obtain such licenses. In Burj Mughaizal, fishers were accused of weapons smuggling and affiliation with terrorist groups without any tangible evidence beyond security reports, which were hardly disclosed to the defendants' lawyers.

Detention conditions and treatment in custody also raise serious concerns about compliance with international standards. Articles 7 and 10 of the Covenant<sup>122</sup> require that detainees be treated with dignity and protected from torture or cruel, inhuman, or degrading treatment. However, testimonies indicate the death of a fisher, Alaa Fathallah Abu Heikal, due to medical negligence, malnutrition, lack of basic healthcare, and difficulties in accessing medication. Some families reported being denied visits or the ability to provide essential medical supplies. These conditions constitute serious violations of the right to life and human dignity and place legal responsibility on the prison authorities for the harm and deaths resulting from negligence and cruel, inhumane, or degrading treatments in detention facilities.

### **Violations of Social and Economic Rights:**

The aggravation of poverty, unemployment, and school dropouts documented in this report clearly illustrates breaches of economic and social rights as enshrined in international conventions, particularly the International Covenant on Economic, Social, and Cultural

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<sup>117</sup> "International Covenant on Civil and Political Rights", United Nations, Ibid.

<sup>118</sup> Ibid.

<sup>119</sup> Ibid.

<sup>120</sup> Ibid.

<sup>121</sup> Ibid.

<sup>122</sup> Ibid.

Rights, which Egypt ratified in 1982 and which forms part of its binding international obligations. Article 6 of the Covenant recognizes “the right to work, including the right of every individual to the opportunity to earn a living by freely chosen work, and to take appropriate measures to safeguard this right,”<sup>123</sup> while Article 23(1) of the Universal Declaration of Human Rights guarantees the right to work, free choice of employment, fair and satisfactory working conditions, and protection against unemployment.<sup>124</sup> The restrictions imposed on fishing activities and the issuance of licenses, as well as the harassment of local fishers, directly violate this fundamental right. The vagueness of such measures enables their use as pressure tools or collective punishment against fishing communities, undermining the economic and social structure of families dependent on fishing, and driving them into poverty and marginalization, in violation of Article 7 of the Covenant, which obliges states to ensure “fair and just conditions of work that provide adequate living standards for workers and their families.”<sup>125</sup>

The loss of income faced by many families in coastal areas stands in contrast with Article 11(1) of the Covenant, which stresses the right to an adequate standard of living, including sufficient food, clothing, housing, and continual improvement of living conditions,<sup>126</sup> which is also enshrined in Article 25(1) of the Universal Declaration of Human Rights.<sup>127</sup> The loss of livelihoods without compensation or state support has forced some fishers to abandon their profession or migrate internally or irregularly, contrary to Article 8 of the Egyptian Constitution<sup>128</sup> and Article 9 of the Covenant,<sup>129</sup> which recognize the right to social security and essential economic, social, and cultural rights. The absence of compensation or material support for affected families represents a serious breach of national and international obligations, forcing fishers to rely on loans or charity and highlighting structural weaknesses in social protection schemes meant to safeguard vulnerable groups affected by economic or administrative decisions.

The right to a healthy environment, recognized under Article 12(2) of the Covenant,<sup>130</sup> the 1992 Rio Declaration,<sup>131</sup> and Articles 30 and 45 of the Egyptian Constitution,<sup>132</sup> is another right jeopardized by mega projects, as suggested by the testimonies from fishers and residents of the areas surrounding Lake Burullus, according to whom authorities have turned a blind eye to illegal fishing activities that destroy aquatic ecosystems and fish stocks, while traditional fishers are criminalized under the pretext of law violations. This neglect of environmental protection obligations results in a dual violation: damage to the environment and fish stocks, and the erosion of fishers’ livelihoods, ultimately undermining the fundamental economic, social, and environmental rights of coastal communities in Egypt.

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<sup>123</sup> “International Covenant on Economic, Social and Cultural Rights”, United Nations, <https://egyptwide.short.gy/iO9aoP> (last accessed December 21, 2025).

<sup>124</sup> “Universal Declaration of Human Rights”, United Nations, Ibid.

<sup>125</sup> “International Covenant on Economic, Social and Cultural Rights”, United Nations, Ibid.

<sup>126</sup> Ibid.

<sup>127</sup> “Universal Declaration of Human Rights”, United Nations, Ibid.

<sup>128</sup> الدستور المصري المعدل 2019، منشورات قانونية، مرجع سابق “

<sup>129</sup> “International Covenant on Economic, Social and Cultural Rights”, United Nations, Ibid.

<sup>130</sup> Ibid.

<sup>131</sup> تقرير الأمم المتحدة المعني بالبيئة والتنمية، يونيو 1992، الأمم المتحدة، تاريخ الاطلاع 25 ديسمبر 2025 “

<https://egyptwide.short.gy/sdLPrZ>

<sup>132</sup> الدستور المصري المعدل 2019، منشورات قانونية، مرجع سابق “

## Conclusion:

Since 2014, Egypt has witnessed an unprecedented militarization of its economic sphere. Through cumulative policy reforms, the EAF consolidated its control over economic governance processes and institutions, as well as key sectors of the national economy. The government's recipe for economic development, consisting largely of huge-scale complexes for the production of goods and services, known as mega projects, both sustained and masked the intensification of military dominance. The EAF thus came to dominate infrastructure, housing, agriculture and food processing, mineral resources, technology, and even media, consolidating power while concentrating capital.

Through affiliated entities such as the Armed Forces Engineering Authority and the National Service Projects Organization, thousands of projects were directly awarded without public bidding processes or sufficient public scrutiny into their feasibility and long-term sustainability. The development of fishing and aquaculture enterprises in the Northern lagoons region represents a blueprint for the broader process of militarization of the Egyptian economy. This report analyzed the negative socio-economic trade-offs of military involvement in four lakes, including the displacement of civilian businesses and the loss of livelihoods, the lack of consultation with local communities in the design of state interventions and the lack of compensation for those affected, the arbitrary recur to martial law and courts to exclude civilians from the local economy, and the inhumane conditions faced by those in detention.

The authorities' arbitrary refusal to renew fishing licenses or engage with locals to provide solutions indicates that poverty and unemployment are not simply unintended consequences of the mega projects, but rather part of the broader pattern of dispossession and marginalization of civilians in a military-dominated economy.

This research shows that the mega projects analyzed failed in achieving their intended objectives in the fields of poverty reduction and curbing irregular migration through the creation of employment opportunities. Military-led mega projects are known to employ a conscript workforce, sidelining civilians in the pursuit of employment opportunities, if not excluding them from employment altogether. The fishers and local community members interviewed by EgyptWide reported significant losses of income and business activities in consequence of the establishment of mega projects, and pointed to the absence of job opportunities in the new military-led enterprises.

Contrary to government narratives, we have found the mega projects examined in this report to have increased the incentives to irregular migration by depriving local communities of their primary means of sustenance, dramatically altering the demographic landscape of the coastal areas where they were established, some of which became home to smuggling and criminal networks after the displacement of locals.

Rising unemployment, lack of job opportunities, and the contraction of the private sector represent a driving force for seeking alternative prospects, even through dangerous means. Consequently, irregular migrants are exposed to further violations on their journeys via the Mediterranean and Balkan routes.

## Recommendations:

### In light of the evidence presented, the Egyptian authorities must:

1. Immediately cease all acts of repression against fishers in Lake Ghalioun, Lake Manzala, Lake Burullus, Lake Mariout, and their surrounding areas in connection with the enforcement of Presidential Decree No.294 of 2019; drop all unsubstantiated charges, and dismiss all related cases, including Case No. 622 of 2020, and Cases No.7702, 7812, and 7966 of 2024; and uphold civilians' right to be tried before competent, independent, and impartial civilian, rather than military, courts, in accordance with Egypt's obligations under international human rights law, including Article 14 of the International Covenant on Civil and Political Rights (ICCPR).
2. Repeal Presidential Decree No. 294 of 2019 designating Lake Ghalioun, Lake Burullus, Lake Manzala, and Lake Mariout as military adjacent, re-empower civilian agencies to oversee the management and development of water resources, including lakes, and suspend the application of military law to the management of the sites.
3. End military dominance in the national economy, including the fishing sector, specifically by introducing standards of democratic scrutiny and decision-making in all economic governance processes and at all levels of government; by bringing enterprises owned, controlled or run by the EAF under the oversight of civilian agencies and governmental bodies; repealing Presidential Decrees No. 127 and 446 of 2015; and upholding socioeconomic rights enshrined in the Egyptian Constitution, and the UNGPs No.3(b), 4, and 8.
4. Guarantee the issuance and renewal of fishers' licenses through standardized, public, and transparent mechanisms, fully controlled by civilian authorities, upholding their right to secure the means of sustenance. Provide fishers of Lake Ghalioun, Lake Manzala, Lake Burullus, and Lake Mariout with fair compensation for the loss of livelihoods and the confiscation of fishing equipment at least since 2019.
5. Conduct and publish in-depth feasibility and sustainability assessments ahead of the initiation of any development or nature restoration initiatives, involving independent experts and consulting with local communities over the design of projects and the identification of desired outcomes.
6. Disclose all contracts and decisions governing lake development projects, including cooperation protocols between military and civilian bodies, project management arrangements, and land and water allocation frameworks, in order to guarantee access to information and enable parliamentary and public oversight over the management of public resources.
7. Establish an independent and effective mechanism for continuous dialogue between government bodies and fishers' representatives and associations, with a mandate to receive complaints from fishers and local communities affected by lake development projects, and provide transparent recourse mechanisms to ensure prompt, independent and impartial investigations into all abuses, including arbitrary detention, ill-treatment, and the confiscation of property.



EgyptWide for Human Rights is an independent organization dedicated to promoting human rights, accountability, and justice across Egypt—so to say, Egypt-wide. Our work combines research, advocacy, and international solidarity, centering the voices of human rights defenders and vulnerable groups. We envision a just, inclusive, and democratic Egypt, where dignity, civic participation, social justice, and just peace are guaranteed to all. We advocate for accountable and fair international relations, with a focus on business and trade, as well as cooperation on security, migration, and energy.



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